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ABSTRACT

This report is a record of a one-day seminar sponsored by the National Center for Education Statistics (NCES). The theme of the conference was the timely issue of the role of nonpublic schools in educating American children. The participants were: (1) representatives of private schools, (2) federal policymakers; and (3) researchers. Jay Noell introduced the seminar. Roy Nehrt discussed specific technical issues involved in survey design and management. Joel Berke identified six points in the Education Amendments of 1978 that increased the policy relevance of data on nonpublic schools. Fritz Edelstein discussed the relationships of private schools to participation in programs administered by the United States Office of Education. Marty Jacobs discussed data availability and data needs with regard to four major policy areas: (1) the extent of current federal support for private education; (2) the need for federal aid to private education; (3) who would benefit from increased aid to private education; and (4) the effectiveness and quality of private education. Joanell Porter presented specific details of the current NCES-sponsored survey of nonpublic schools. Robert Lamborn described the progress made in developing data on nonpublic schools. Rhoda Goldstein and Frank Bredeweg discussed several problems encounted in the survey effort. Otto Kraushaar provided a solid historical perspective for the role of the private sector in American education. Don McLaughlin set forth a model for increasing meaning and significance of survey efforts and listed three areas of federal policy concern: (1) whether nonpublic schools enhance or interfere with the achievement of the goals of federal aid programs; (2) the extent to which nonpublic schools promote or inhibit the opportunity for diverse educational experiences; and (3) the effects on public schools of major shifts in the size of nonpublic school enrollment and the likelihood of those shifts. A copy of the survey questionnaire for the survey of nonpublic elementary and secondary schools is appended. (JAZ)

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Technical Report No. 2

Meaning and Significance in the Analysis of the Nonpublic School Survey

Donald H. McLaughlin, Editor

Prepared by

SAGE
STATISTICAL ANALYSIS GROUP IN EDUCATION

For the

National Center for Education Statistics

U.S. DEPARTMENT OF EDUCATION
Office of Educational Research and Improvement
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TECHNICAL REPORT 2

MEANING AND SIGNIFICANCE IN THE ANALYSIS OF THE NONPUBLIC SCHOOL SURVEY

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Summary

This report is a record of a seminar sponsored by the National Center for Education Statistics that brought together (1) representatives of a sector of the American educational system, (2) federal policymakers concerned with that sector, and (3) researchers who had studied that sector. These participants discussed the data needs with respect to the sector and the implications of these data needs for NCES survey analysis and reporting activities. An audience made up of members of the NCES staff brought up particular data collection issues for consideration by the seminar participants.

This one-day seminar was held just prior to the President's signing the Education Amendments of 1978. Because the new law focuses more than ever before on the role of nonpublic schools in educating America's children, the selection of this sector for the seminar was particularly timely. The federal policymakers had recently been involved in the House-Senate conference meetings in which the amendments had been discussed and amended, and NCES was in the final stages of preparing data from a survey of nonpublic schools for dissemination. As a result, the discussion was lively and dealt with concrete specifics, not generalities. This summary will focus on the recommendations made by the presenters concerning ways to ensure that the Center's analyses and reports in this area will be meaningful and significant.

Jay Noell, on the Center's staff, introduced the seminar, clarifying the context of the seminar and setting forth five questions for consideration. These concerned (1) how to decide how often to conduct a survey, (2) how to decide between a sample and universe survey, (3) how to decide on the questionnaire content, (4) how to decide on report format, and (5) how far to go beyond mere reporting of results of a particular survey in preparing a report.

Roy Nehrt, director of the branch of the Center responsible for collecting data on public and nonpublic elementary and secondary schools,

then discussed specific technical issues to give the participants an idea of the complexities involved in survey design and management. He pointed out the value of collecting identical information over years to develop trend information; he pointed out the difficulty involved in so simple a process as defining the term "school"; he pointed out the difficulties in convincing the respondents of the good intentions of the survey managers; and he pointed out the difficulty of getting valid, meaningful responses to items such as financial questions. He asked for guidance from policymakers on the need for various types of information, such as disaggregations of the data by grade and sex of the students; on ways to determine the timeliness of report release; and on ways to determine just what information to include in reports.

Following these presentations, three Washington policymakers presented their views on data needs for federal policy on nonpublic schools. Joel Berke identified six points in the Education Amendments of 1978 that increased the policy relevance of data on nonpublic schools. First, there is a heightened focus on participation of private schools in federal programs. Second, private school students are to receive "dollar parity" with public school students in provision of federally supported services. Third, there are heightened provisions for enforcing private school involvement in public funding. Fourth, provisions for bypassing LEAs to provide needed aid to private school students are strengthened. Fifth, there is a requirement for evaluating federally funded programs in private schools. Finally, the language of the law indicates a federal interest in the contribution of private schools to improving educational quality. He then identified three information needs that follow from these points: baseline data on the role of private schools, evaluation of federal program effectiveness in private schools, and alternative policy approaches. In Berke's opinion, this would call for an integrated federal data collection effort, and NCES should report on other surveys as well as its own.

Fritz Edelstein then discussed the relationships of private schools to participation in programs administered by USOE. The most important data need, he thought, was a statistical description of the students in nonpublic schools who participate in federally funded programs. Information

on the overlap of needs and services and on the costs of services will also be needed by USOE. Emphasizing the difficulties in defining "schools" mentioned earlier, he indicated the need for data on private nursery schools, which are not included in the current NCES survey. In the exchange that followed this presentation, the concept of an integrated federal data collection effort was brought up, and parameters of its implementation were discussed.

Next, Marty Jacobs discussed data availability and data needs with regard to four major policy issue areas. These were (1) the extent of current federal support for private education, (2) the need for federal aid to private education, (3) the question of who would benefit from increased federal aid to private education, and (4) the effectiveness and quality of private education. She mentioned the Current Population Survey, various NCEA studies, the Anchor Test Study, and a study being conducted by NIE as supplementary data sources. There followed a lively discussion of problems of different survey methods and presentations of different perspectives on financial issues concerning nonpublic schools.

Following a lunch break and introduction of the afternoon session by Marie Eldridge, the Center's Administrator, specific details of the current NCES-sponsored survey of nonpublic schools were discussed by the survey's Project Officer, Joanell Porter. She reported a positive relation between simplification of one long question (grade by sex breakdown of enrollment) and respondent cooperation, and she brought up the difficulty of obtaining financial information. This led to a heated discussion of the willingness and the ability of private schools to provide data to the federal government. It became apparent that many nonpublic schools remain unconvinced of the good intentions of the federal government with respect to their sector, an attitude reinforced by the decision by the Internal Revenue Service in the fall of 1978 to seek to remove the tax exempt status of nonpublic schools that could not demonstrate lack of racial bias.*

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*This decision was substantially modified when brought up for congressional debate in 1979.

Various tradeoffs, such as the provision to the government of more extensive financial information but only in aggregate form, were suggested.

The next two presentations were by representatives of the private sector: Robert Lamborn, of the Council for American Private Education, an umbrella association of which the major nonpublic school associations are members; and Rhoda Goldstein and Frank Bredeweg, of the National Catholic Education Association. Mr. Lamborn described the progress that had been made in twenty years in developing data on nonpublic schools and recommended ten steps that would contribute to further progress in the near future. (1) A link between private schools and Local Education Agencies should be established. (2) A link should be made to congressional districts. (3) Detailed information on federal program participation should be kept up to date. (4) Information on state program participation should be organized. (5) Information on the race of students must be obtained. (6) Information on socioeconomic background should be obtained. (7) A breakdown of enrollment by regions and city size is important. (8) Data on private and public schools should be coordinated to allow aggregation and comparison. (9) Data should not be aggregated in reports in such a way that the large differences between schools of different denominations are masked. Finally, (10) reports of data should be carefully adjusted to reflect the total population of nonpublic schools, not merely those that were found and responded. He suggested involvement of specific other research groups in a coordinated data acquisition effort.

Rhoda Goldstein and Frank Bredeweg discussed several problems encountered in the survey effort and made four recommendations for future efforts. First, a long-range plan (more than five years) should be developed. Second, a two-year cycle for the survey should be adopted. Third, an analysis of the responses should be undertaken to determine what could be omitted from the questionnaire, possibly to make room for more crucial items of current interest. Finally, as much of the survey effort as possible should be carried out by representatives of the nonpublic school sector.

Otto Kraushaar, who had undertaken the major data collection effort for nonpublic schools prior to the current NCES surveys (Kraushaar, 1970), provided the seminar participants with a solid historical perspective for the role of the private sector in American education and discussed the social and economic trends that are most critically affecting nonpublic schools today. The quantitative results from his survey of the problems of these schools in 1969 provide a valuable context and add meaning to the presentation of data on schools in the late seventies. The primary problem, he pointed out, is financial. Also of importance is a need to be able to respond to demographic changes, and there is a need to bring to the attention of public policymakers the extent of the private school contribution to American education and social development.

In the final presentation of the day, Don McLaughlin set forth a model for increasing the meaning and significance of survey efforts by focusing on the intended audiences of potential reports and their information needs. He listed four areas of federal policy concern: (1) whether nonpublic schools enhance or interfere with the achievement of the goals of federal categorical aid programs, (2) the extent to which nonpublic schools promote or inhibit the opportunity for diverse educational experiences, (3) the potential effects on public schools of major shifts in the size of nonpublic school enrollment and the likelihood of those shifts, and (4) the "side effects" outside of the educational system of actions to aid nonpublic schools. He suggested several analyses of the current survey that would be relevant to these concerns, although the survey by itself is not sufficient for addressing all of the concerns and a combination of data sources would be necessary for any planned reports.

This seminar did not so much answer technical questions as it suggested a format for planning survey and reporting efforts to maximize meaning and significance. The surveys of the Center, the participants felt, should be viewed as components of an overall process, and the selection and interpretation of data elements should be based on an understanding of the information needs of policy developers. Merely bringing together representatives of the various constituencies for this one-day meeting was viewed as a significant step toward more meaningful and significant analyses.

The seminar was tape recorded, and this report consists of an edited version of the transcript of that tape. Due to recording limitations, not all of the questions and comments of audience participants were captured; and in a few cases when they were captured it was impossible to identify the speaker. During most of the seminar, however, the questions, comments, and speakers were identifiable. The presentations by Kraushaar, by McLaughlin, and by the representatives of NCEA included here are based on written versions submitted by those authors.

The transcript was typed by Carrie Davis of the American Institutes for Research and edited by Don McLaughlin. The editor apologizes for any distortions he may have introduced during editing.

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MEANING AND SIGNIFICANCE IN THE ANALYSIS OF THE NONPUBLIC SCHOOL SURVEY

Introduction (Jay Noell, National Center for Education Statistics)

This seminar really has two purposes: the first is to try to get some suggestions and guidance in terms of analyzing data from the Nonpublic School Survey; the second, more general purpose is to try to get suggestions for strategies to use in analyzing NCES data in general. In other words, we want to focus on the processes by which meaning and significance are injected into survey analyses, but we would like to use the Nonpublic School Survey as an example for getting at this. The justification for the seminar is contained in P.L. 93-380, which says the following:

> The purpose of the National Center for Education Statistics shall be to collect and disseminate statistics and other data related to education in the United States and in other nations. The Center shall [among other things] conduct and publish reports on specialized analyses of the meaning and significance of such statistics.

One of the primary purposes of this seminar is to decipher what it means to do "analyses of the meaning and significance of such statistics." To place this provision in P.L. 93-380 in context, let me mention some of the other sections of that legislation. In addition to changing the allocation criteria for Title I funds and in addition to expanding and amending Title VII, pertaining to Bilingual Education, that law first established the Center as an independent statistical agency. P.L. 93-380 also mandated the survey of income in education to get at the number of poor children in each of the American states. It also mandated some 20 special resource evaluation and assessment studies, including the development of a report on the Condition of Education in America.

Now, it is often maintained that Congress is not really terribly interested in quantitative statistical analyses, that such analyses have little impact on legislation, and that really the only kind of hard data that Congress is interested in is voting statistics. This legislation suggests otherwise, however, in that it contains language reflecting a great deal of interest in quantitative studies. It is also worth pointing out that

the mandate to do analyses is very general; this goes against an increased tendency for Congress to mandate specific kinds of studies and to dictate fairly precisely the kinds of things that they would like to see the various statistical- and policy-analysis agencies doing. This can be a self-defeating policy, because quite frequently when Congress mandates a particular study be done, they do not allocate or appropriate additional funds to do such projects. This means that funds must be taken out of general purpose reserves to do specifically mandated studies, which reduces the amount of money available to do analyses addressing more general kinds of issues that Congress might ultimately be interested in. In a sense, then, we have an advantage in having a very general kind of mandate with which to do analyses.

I don't want to anticipate the kinds of things the various speakers will be saying today, but I would like to give you a framework to interpret some of the things they say. In approaching the problem of doing analyses of the meaning and significance of statistics, there are two general kinds of approaches that one might take: the first might be called a theoretical approach; the second, a problem approach. In terms of taking a kind of theoretical approach to analysis, the primary concern is to develop a general theory or framework for interpreting or for understanding phenomena in question. Analyses oriented from this perspective tend to classify variables into three broad categories that might be called resources (input), processes (transformations of those inputs), and results (output). The primary goal of this kind of analysis is to relate these variables to one another, to try to link up the resources to the processes and thence to the results, and to develop and test a general model.

In contrast, the problem-oriented approach to analysis tends to be driven by the need to respond to specific problems that are faced by legislators, administrators, and policy-makers. Often, such analyses call for the generation of specific kinds of information, such as the number of people who are affected or impacted by a given law, regulation, or policy change. While the generation of such information might call for sophisticated kinds of technical expertise, no theoretical pay-off or development usually results.

In thinking about these two kinds of approaches, one might be tempted to label the theoretical a kind of "academic approach" that has no real *relevance, and the problem approach as a kind of "real policy analysis."* I think one should refrain from doing that, however. There are two kinds of differences in these two different approaches. One is in terms of a timeframe--the theoretical approach tends to be more oriented to improving decision-making and policy-making over the long-run, by giving us greater insight into the processes that we are trying to understand, while the problem-oriented approach attempts to generate answers in the short-term, if you will, "to put out the latest fires." The second kind of difference is in terms of the breadth of perspective that is involved. The theoretical approach attempts to make fewer simplifying assumptions about outside factors that might be acting upon a particular area of concern and, hence, is somewhat more complex and perhaps more time-consuming and expensive to carry out.

As we turn to the particular survey that will hold our attention today, the Nonpublic School Survey, there are a number of questions that I would like to throw out to the seminar and that I hope you'll think about. If and when it seems appropriate, I hope you will address them, because we are trying to get not only general guidance in terms of appropriate analytical strategies but also some specific guidance in terms of particular questions we have about this survey. First, it would be appropriate for us to think about the periodicity of the survey. At this point, it looks like we are going to be doing it annually. Is this appropriate? Should we hold off and do it every other year? every five years? What is a good time-span between surveys?

Second, what kind of coverage would be appropriate? Is it necessary that it be, in effect, a census survey each year? Could we get better data, a more timely product, if we just surveyed some institutions, or surveyed the population on a sample basis?

The third question pertains to the content of the survey. What kinds of items would we like to see added or deleted from the survey? Do we really need the finance data? Do we need more finance data? Should we assess student characteristics?

The fourth thing that we need to think about is, when we do about analyzing the results, how should we report them? What kinds of things do people want to know about in terms of an advance report? What kinds of interests do people like to see addressed in the final report.

Finally, I think we need to think about the context in which we look at the data. What other kinds of information should we try to consider when looking at these statistics? This could include a broad range of things, including statistics that are available from other sources.

Scope of the Nonpublic School Survey (Roy Nehrt, National Center for Education Statistics)

I would first like to qualify the activities of our branch with respect to this survey. The Institutional Surveys Branch is essentially the collector and tabulator of elementary/secondary education data. Our analysis responsibility is limited to very cursory kinds of analyses, best described, perhaps, in terms of cross-tabulations of related variables. For example, we produce private school survey tables that show a distribution of a number of schools by size, by affiliation. That's about the extent of the kind of analysis work that we do. The Center also has an Analysis Branch within the Division of Elementary and Secondary Education, and hopefully we will be able to go into the more indepth kinds of analysis when that branch is full staffed.

With respect to the private school survey, we first surveyed the schools in the 1976-77 school year; we conducted a second survey during the 1977-78 school year; and there is a survey currently in the field for the 1978-79 school year. We have maintained essentially the same data set on the survey form, so that at the conclusion of this year's survey we should have a data base with three consecutive years of essentially the same data. Thus, there is a good possibility of a trend analysis at this point in time, to see whether there are any significant changes in numbers of schools, enrollments, organizational patterns, and so forth.

It has been a census for each of these three years. Unfortunately, the universe of private schools is a rather elusive kind of "amoeba" that seems to "squish" around here and there, and I don't believe there's anybody in the United States who knows how many private schools there are in the United States. One of the other problems in any kind of a school survey is that of the definition of the school. I've been in NCES now almost fifteen years and I have yet to sit in on a meeting like this and find three people who agree on the definition of a school. Is a school an administrative unit? Is a school a building? Is a school a site? What is a school? We have excluded the so-called nursery schools and day-care centers from this survey, because, first of all, they are extremely difficult to identify. Secondly, many of us are concerned over whether a prekindergarten/kindergarten school is really a school, in the sense that it has some kind of an educational program for the children , or whether

it is essentially a day-care center where the education of these children is secondary to its primary purpose. The scope of the survey has been primarily on bonafide elementary/secondary schools, schools which would go beyond what we normally think of as a nursery school (prekindergarten, kindergarten, and possibly first-grade). We have said that the schools we covered would have to have at least a second grade.

For the past three years, NCES has contracted with the Council for American Private Education (CAPE) and the National Catholic Educational Association (NCEA) for data collection and editing. CAPE originally compiled a list of some 20,000 to 25,000 schools from a variety of sources. That list was used as our universe for the first survey attempt. As we got into that first survey, we found that there were a number of duplications within that list; there were some public schools included on that list, and there were a number of schools that had apparently either closed since the list had been compiled or never really existed at all. We have sharpened up the universe in the past three years, as the result of the two previous surveys and the one that is in progress. CAPE and NCEA are responsible for contacting the schools through their member organizations: in the case of CAPE, through various affiliated groups, and in the case of NCEA, through the diocesan school systems. The collection methodology seems to have worked rather well because of the closer contact that the two organizations have with the member schools. One of the problems, as you are probably well aware of, is that, when the DHEW attempts to acquire data from private schools, a wall goes up almost immediately around some of the private schools. "Why do the Feds want to know anything about us?" "What are they going to do to us if we tell them anything about ourselves?" We had some rather severe nonresponse problems in the first-year survey. Through the efforts of CAPE and NCEA, I think we have mitigated and resolved many of these problems. In the second year of the survey we had a much better response rate than we did the first year. Hopefully, we will improve upon that response rate in this third survey.

Now I would like to take off, for a moment, on some of the problem areas that Jay had mentioned and expand a little bit on them. The survey form was developed initially primarily with input from Bob Lamborn, Frank Bredeweg, and Dwight Crum. It was intended to be a general statistical survey. It was

not intended to be any kind of in-depth survey in terms of the kinds of programs that were offered, the extent of the course offerings, and ancillary kinds of services that were provided to the children, participation in federally-funded kinds of activities, or anything like that. What we were attempting to do was to identify the schools, find out how big they were, where they were located, what kinds of schools they were, and what religious affiliation, if any, they might have, and to get some very gross kinds of data on staffing of these schools. Although we attempted to get some financial data, the response to the financial section of this form has been, from my perspective, largely disastrous. There is no uniform classification of revenues or expenditures among private schools. It makes it extremely difficult to format a collection document to acquire information about income and expenditures. Tuitions are calculated in a variety of ways. We have a mixture of day-schools and boarding schools. It's difficult to sort out how much of the payment the parent makes is really for the educational program, and how much of it is for dormitories, room and board, and peripheral activities. The response rate, when we get down into the detail of the financial data that we were trying to collect, is very, very poor. Inaccuracies abound. It's interesting to find that one of these schools might have $200,000 income and $600,000 expenditures. We have found that frequently; or a school will have $100,000 income and $300,000 in expenditures. It's difficult to call back, when we have thousands of these kinds of peculiar things develop, and try to find out what they reported wrong, what they may have left out, or whatever.

I have some questions, in my own mind, about the data set that's on the form that we have used. Do we need as much data as we are collecting? Do we really need to get grade enrollments of each school, should we get only total enrollment for each school, or could we substitute grade-spans of pupils served in the school? Do we really need to get a detailed full-time equivalent count of staff in several major categories? Or would it be well, say, to get the full-time equivalent of classroom teachers and support service staff? My experience in conducting these kinds of surveys has been that the fewer items you include on the survey form, the higher level of aggregation that you go for, the greater is going to be your success. In other words, if we ask for total school enrollment rather than enrollment by grades, and couple that with grade-span of pupils served, we could probably improve the quality

of the response and the response rate significantly. So that kind of a question keeps coming up in my mind. Is enrollment by grade needed for each private school in the United States, or could we trade-off that excessive detail, getting more gross figures, better response, and more valid response?

Is there really a need to know how many private schools are boys-only, girls-only, and coed? How many of them are boarding schools? How many of them are day-schools? How many of them are combined boarding and day-schools? In other words, what I'm trying to get at is that maybe we should focus on what we would consider critical content, because all of this peripheral information that may or may not be of value adds to the burden, diminishes the response rate, and impairs the timeliness of the report. I'd like to throw these kinds of questions out to the group.

We have a couple of items on the form having to do with programs. They are very gross kinds of forced-choice items. For example, "In general, does this school offer a regular academic program, a special education program for the handicapped, compensatory education program for disadvantaged, a vocational/technical program?". Is this kind of information needed? Is it needed in greater detail? This is about the minimum amount of detail that I think you could go for in this kind of a setting. "Does the school have some form of a bilingual program?" Bilingual education is apparently "red-hot" right now. Presumably, that kind of item ought to be retained. The problem is: how does a headmaster or a principal react to that? All he sees is, "Does this school offer any courses other than foreign languages which are taught in a language other than in English?". He may decide that they have some literature course taught in Polish and check "Yes." Well, that wasn't really the intent of that kind of question. Can that kind of question be sharpened up? What we're really after is, "Are you offering courses in their native languages to children who have English language difficulty?" Almost any way you word this kind of a question you run into various kinds of problems.

We have a very global item on participation in federally funded activities. The categories are Title I, Title IV-B (Library Resources, Guidance, and Testing), Title IV-C (Supplementary Centers and Services), and the School Lunch Program, and then "others"--now are those the kinds of

things that researchers and analysts are interested in? Are they interested in more detail or less detail? These are some of the kinds of questions that I hope this group will be addressing today, and I hope we can come up with some notions of those things that we are not collecting that would be of great value to a great many people. Are there some things that we are collecting that are of very minimal value and then only to a relatively few people? If we proceed with the survey, we think it's about time that we start evaluating the content of the survey form.

Another issue that I think we need to address is that of timeliness. Are there any ways we can improve timeliness? The 1977-78 survey was finally closed out in June. The last returns came in from CAPE in June; the last ones came in from NCEA a month or six weeks earlier. Is there any way that we can compress the data collection and editing cycle and have all data, say, by mid-winter and then available for publication?

Finally, the third thing that I would like to throw out to you concerns reporting. We put out an advance report on the 1976-77 survey using our perception of what we thought people wanted to know, and we put about 10 or 12 basic tables in the report. Is that the kind of information people want as soon as possible or do they want different kinds of information? We're planning an advance report on the 1977-78 survey and we're just finishing processing those data at the moment. What would you like to see in that kind of an advance report? This would be a relatively small and short report that we hopefully could get out in a hurry. What do you want to see? Do you want to see distributions of schools by size by affiliation? Do you want to see distributions of schools by size by type of school? Enrollments by affiliation? Number of schools by affiliation? Do you want state distributions? What is it that you want? I hope that some of you will address these questions and will give us some insights in terms of a consensus that might develop on the need for certain kinds of tabulations early, the need for more detailed tabulations later. We went through the survey form; we developed about 90 different tables--just about every conceivable way that you could examine the data. Is anybody interested in that <u>huge</u> mass of tables? How many people are interested in the data tapes themselves? If we make the tapes available, with identification of the school on each school

record on tape, are we going to depress our response rates? If you take the perspective of the private school headmaster or principal, if that tape goes over to the Internal Revenue Service, or to the Office of Civil Rights, or to the Equal Employment Opportunity Commission, is some federal investigator going to be knocking on my door the next week wanting to know why I don't have this or why I didn't do that or whatever speculative kinds of conclusions that some of these enforcement officials might arrive at, just by looking at some statistical data? Would it be well, for example, if we are going to release tapes, to strip the name and address of each school off the tapes and provide only some geographic locators, say, such as a zip code or a county where the school is located?

Silverman: Roy, I believe P. L. 93-380 prohibits NCES from guaranteeing confidentiality to schools or other institutions.

Nehrt: It's a legal question--I don't know whether a statistical agency is compelled by law to disclose everything that it collects or whether it is only compelled to disclose summaries of statistics that might be derived from individual responses. I think it would be well if this group would decide if there were any consensus on whether this is indeed a problem, or whether it's just something that happens to bother me personally. Those are some of the points that I would like to raise and I hope, during the day, some of the people will respond to some of these kinds of questions, in addition to the kinds of things that Jay may again bring up as the day goes along.

Discussion

Member of Audience: What were the response rates?

Nehrt: I don't have the exact figures. Joanell, do you have anything?

Porter: It was much better in 1977-78 than 1976-77.

Nehrt: I think for the Catholic schools it was around 99% this year, wasn't it?

Porter: 100% as far as we could determine.

Nehrt: In the private schools, I think, all the remaining private schools, it was 85-90%.

Lamborn: I think about 90% from the CAPE member organization schools, aside from the Catholic.

Nehrt: This was a considerable improvement over 1976-77. In 1976-77, we got off to a late start and encountered a number of problems along the way. In 1977-78, we improved our start slightly but not all that much. This year, we got off to a late start again. Hopefully, we can recover from that.

McLaughlin: I would like to ask a question about the scope of the surveys; that is, how did it compare with the previous surveys of nonpublic schools, such as the one in 1970-71? Was it a similar effort?

Nehrt: Yes, it contained very similar variables. It's basically enrollment, staffing, and a little bit on finance. The earlier survey included a race/ethnic distribution of pupils and staff. Many of the schools (perhaps as many as half of them) refused to divulge the race/ethnic distribution. I would say the Catholic school response was comparable in the earlier survey to what it was now. The private school response was frankly very poor. At the time, CAPE was not in existence; there was no national consortium of private schools. We employed a contractor, unfortunately at the eleventh hour, who did a miserable job of collecting the private school data for us.

McLaughlin: So trend analyses would only be valid, if at all, for the Catholic schools?

Goldstein: The Catholic school survey was completely contracted to NCEA in 1970-71, including development of survey instruments, and it was much more intensive than what we are doing now.

Nehrt: It was a four-page questionnaire, in 1970-71.

Member of the Audience: Before the first survey was developed, were there any handbooks or other guides or definitions to indicate how to respond to the survey?

Nehrt: There were handbooks--classifications of pupils, classifications of staff personnel. Unfortunately, I don't think those handbooks were widely distributed to private schools and I suspect the schools which did get them probably didn't use them, because they had their own kinds of classifications. The NCEA, I would assume, has had classifications of pupils, staff, and finances for many, many years which are good for NCEA purposes but might not correspond very well to NCES classifications. This is a perennial problem. What is a teacher? What is a principal? What is a guidance counselor? What is a psychometrist? And so on. When you're attempting to collect data on staff personnel resources, by type of assignment, you have in a small school a person who is a principal, teacher, and counselor. If you go to full-time equivalents, the principals of many small schools will not quite understand the notion of full-time equivalents or how it is computed; even the fundamental concept of full-time equivalents doesn't really yield comparable data. If you employ a cafeteria worker for 20 hours a week and a teacher for 40 hours a week, the full-time equivalent of the cafeteria worker is 20 hours; the full-time equivalent of the teacher is 40 hours. Do you add 1 and 1 and get 2? Or do you get 1-1/2? And if you really want to find out the extent of staff personnel resources at the finer levels of detail, you not only have to get full-time equivalents by assignment classification, but you've got to get the base-time figure. Then, what do you do with the 10-month principal versus the 12-month principal, or the 10-month teacher versus the 12-month teacher. Even though they may work the same number of hours per week, they don't work the same number of hours per year. Of course, if you want to go to that level of detail on staff resource allocation, you might as well "trash-can" your survey forms and save your postage, because you are not going to get very many of them back.

Panel on Meaning and Significance for Federal Policy

Meaning and Significance from the Perspective of the Assistant Secretary for Education (Joel Berke, Educational Policy Research Institute, formerly Deputy Assistant Secretary for Educational Policy Development)

What I would like to do in 15 minutes is to indicate to you some of the reasons why data on nonpublic schools are more important these days than they were back in 1971, or even in 1976, and to say a few words about the broad directions of our new legislation as it affects private schools. I'm sure Fritz Edelstein will deal with them in more detail. Then I would like to say a word or two about how NCES and this particular type of form and activity fits into the policy process, as I understand it, in DHEW and on the Hill, as well.

Let me start by pointing out that the concern with the private schools of the nation is much more salient now for a number of reasons. First, contrary to some cynical views, it didn't arise simply because of the threat of a tax credit on the Hill. President Carter, in his campaign, as many of you know, made very strong statements about the importance of maintaining the private school segment and talked about developing supportive programs at the national level for nonpublic elementary and secondary schools, if we are to maintain a healthy diversity of educational opportunity. Our goal is to develop an aid policy that supports private education without subverting public education. And that was, I think, the guideline that folks within HEW took as they went about developing the new provisions contained in the Education Amendments of 1978.

In the future, private schools are going to be getting increased attention, not simply because of their being dealt more centrally into our federal legislation but because of the effects of Proposition 13-type legislation in the states. As some of you know, Jack Coons and Steven Sugarman, who have been responsible in large measure for the changes in school finance at the state level that have taken place since the Serrano case in 1971, have a new book out on vouchers and are drafting a referendum provision for vouchers for the California ballot in 1980. Therefore, I think the private schools are going to be at the forefront of our concern for a while.

One other little bit of evidence which may be of interest to you concerns Section 1203 of the Amendments of 1978, which is a section that deals with a number of studies that are mandated to HEW and will be conducted by NCES, NIE, and other parts of the Department. One of those studies calls for "an analysis of current and future federal assistance for nonpublic elementary and secondary education, including the extent of nonpublic participation in federal programs, trends in enrollment and cost of private education, the impact of private schools on public school enrollment and financial support, and an examination of alternative federal policies for support of private education." That is, for those of you who are interested, Section 1203e10. It was written in HEW but at the request of one of the key Senators on the Education Subcommittee of the Human Resources Committee, and it was seen as one of the more important items in that list of studies. It appears that we will be concerned with information on private schools for a variety of purposes.

One important provision in the new legislation, of course, is the raising of the status of the Office of Private Education in the Office of Education. That's less statistically important to us, but other provisions have very direct impact on the kind of information that the policy process will seek. A second provision, in most of the Titles of the Act, calls for increased participation in federal programs by private schools. Let me just read an example for those of you who haven't read the legislation. One particular section (Section 302) happens to be in the special projects:

> No grant or contract may be awarded unless the Commissioner determines that in designing the proposal for which the application is made, the needs of children in nonprofit private elementary and secondary schools have been taken into account through consultation with private school officials; and to the maximum extent feasible and consistent with the number of such children in the areas to be served who have the educational needs the proposal is intended to address, those children will be provided an opportunity to participate in the proposed activity on a base that is comparable to that provided for public school children.

That kind of language for participation is written throughout the Titles of the 1978 Amendments.

A second aspect of the new policy is for dollar parity--not just some vague language about equitable treatment--but the new legislation says, for example in Title I (Section 130):

> Expenditures for educational services and arrangements pursuant to this section for educationally deprived children in private schools shall be equal, taking into account the number of children to be served and the special educational needs of such children, to expenditures for children enrolled in the public schools of the local educational agency.

Clearly, dollar parity is going to be an issue worth following.

Third, there are heightened provisions for enforcement of the various involvements of private schools in public funding; and in the Section 171, which deals with state monitoring and enforcement, there is a requirement that the state plans include:

> a description of the means by which the stated educational agency has determined, and will continue to determine, the compliance by local educational agencies with the requirements of Section 130 to the equitable provision of services to children enrolled in private schools.

Another aspect is the bypass provision, which we have strengthened so that if a public agency is <u>not</u> serving its private schools appropriately, the new legislation calls for strengthened provisions to assure that those funds will be delivered by some nonprofit agency.

A fifth point I see in the legislation is the requirement for <u>evaluation</u> of programs that are conducted with federal funds in the private sector (in private schools, private education).

Lastly, I would call attention to the provisions in our legislation which talk about improving educational quality, improving instruction in the basic skills (Section 201). In those provisions there is the provision of public funds for instructional purposes in the elementary and secondary schools in a way that suggests that, if we're interested in the progress due to the use of those public funds, federal policymakers are going to be interested in

the performance of the private schools, in much the same way that they have been of the public schools.

Thus, we're operating in a new world of saliency (at the federal level) for private education; and, in return for these heightened provisions for aid, there will obviously be a concern for more information about how that aid is distributed, how it is utilized, and what changes are necessary in future policy.

Let me conclude by just indicating what the demands may be and how NCES may fit into that. First of all, basic information on the progress and role of private education is going to be sought increasingly in future years. I can imagine, without having worked on those data myself, some of the problems there must be in dealing with the private education, in terms of definitions and things of this sort. There is going to be interest in basic information on what the role <u>is</u> and what the contributions of private education are: and that requires all the kinds of basic baseline data that we have in the public sector. Second, we are going to be seeking information on the effectiveness of the new federal provisions. <u>Is</u> there effective participation? We'll need data in those areas. Third, we're going to need alternatives. The elementary and secondary amendments come up for reauthorization again in five years and, at that point, we'll be formulating alternatives (perhaps sooner than that; occasionally, there is some legislative action when legislation isn't expired, although it isn't that frequent). In developing alternatives to deal with these sections, I'm sure we'll be going through the same process as we did in the past: we'll be calling work groups together from the Office of Education, from the Assistant Secretary of Planning and Evaluation, from the Assistant Secretary's Office, from the Center, and so forth. It would seem to me that the Center ought to be one of the participants in that activity and ought to be able to furnish to those working groups the kinds of information that they require.

I guess what all this means is that the systems for collecting, analyzing, and disseminating data about private schools will be sought increasingly from the Center by higher and higher levels of the administrators and by the Hill. In pulling these materials together, someone is going to have to see its function as <u>not</u> just reporting a particular form, although a

particular form is important and it does need to strike the balance between the level of aggregation that Roy indicates is necessary for proper responses with the level of disaggregation that those of us who work with the issues want to see in the data. In developing those data systems, questionnaires, and publications, I would hope that the Center would be looking more broadly for other kinds of information and data relevant to understanding the contribution of private education and understanding its activities under the provisions. We need to know who is attending private schools and how they compare with others. We need to know things about SES, about racial/ethnic makeup, and about mobility. We need to know things about educational performance. My hope is that the Center will provide information on the condition of private education drawing on the contents of data bases from other places as well.

Member of Audience: Is the question of constitutionality still alive, or is it assumed that the federal government will go ahead and give subsidies to private schools?

Edelstein: I will talk about that in my presentation.

Meaning and Segnificance from the Perspective of the Office of Education
(Fritz Edelstein, U. S. Office of Education)

The law, to be signed by the President at two o'clock tomorrow, makes certain requirements of HEW, to make sure that eligible nonpublic school students participate in several programs sponsored by the federal government. Therefore, I think the bottom line of our basic data need is to know what children have to be served, and so I don't foresee, in the future, concern for the constitutional problem you were talking about. I don't think there's going to be any constitutional challenge to the Ed Admendments of 1978, because we're talking about services to eligible children, as opposed to aid to the schools. Not only the Commissioner, but also the Secretary, is committed to making sure that the Office of Education follows through on the commitment that he, the Secretary as well as the Commissioner, made in many a speech and in his testimony before the Committee.

For example, in Title IV, the grants do not go to the nonpublic school--they go to the local education agency, which is asked to participate with the private school in planning the instructional program. In Title II, the basic skills section, similar kinds of things will have to be worked out in terms of the planning for those with grants in testing. Planning is a cooperative venture with the funds still flowing to the public school and not to the private school. Only the public school districts are eligible to apply for the funds. There are other questions where eligibility criteria come into play. When we are talking about discretionary programs that are not a formula grant situation, for which nonpublic schools and nonprofit organizations could meet eligibility criteria and could eventually get funds directly, then somebody may sue on a constitutional question. (I'm not a lawyer so I won't state whether or not it's illegal, but if schools meet eligibility criteria set up by Congress, they would seem to be entitled to the funds.)

In some respects, what Joel said has a great deal to do with educational programs. How can this survey relate to the new needs of the educational programs we authorized by the Ed Amendments of 1978? What are the kinds of new data needs we're going to have to provide for with this legislation? There is no question that the new legislation sets a stricter standard for

both the states and the Office of Education to look at the participation of eligible students. I think Joel will agree with me that Congress, over the next few years, will be looking very, very carefully at each activity of the Office of Education to make sure that those students who are required to get services do get them. We've almost gotten to the point where what has been in regulation is now in statute. If nonpublic school children are among those for whom funds are provided in Titles I, II, III, IV, and VII in the new Act (which includes possible involvement of bypasses for the specific purpose of nonpublic school participation), the program is going to need to know a variety of pieces of information, such as those that Roy and Joel have discussed.

This is the first in a series of discussions we need to have, to firm up the basis for a survey that is only one of several surveys that need to be done. They may not necessarily all be done by NCES, but they should be done in a cooperative effort to get the information we need so that we can be responsive to Congress and to the variety of constituencies, and also so that we can have information to determine whether agencies that are supposed to be providing services do provide those kinds of services. That is a critical factor. If the data about who has to be served are not available, it's difficult to enforce the law because you don't know what the eligible population is. If we know what the eligible population is and we know they are not participating, then we can ensure they receive the services.

Nehrt: Doesn't this ultimately break down to who is responsible for compliance enforcement? I can see the need for data, but by whom--by the local school district that is responsible for making a bona fide offer of services, jointly developing the plan, and so on, or by a state education agency, or by HEW? I think that's one of the things you have to sort out. If you need data to provide assurance that the local agencies are complying with the law as it is written (and however it's extended in the regulations), then do you collect those data at application time and verify or at least spot-check applications, or do we do some kind of a national survey to try to find out what's going on? There are a number of alternatives, and I think we need to sort out which would be the most effective alternatives to meet each specific kind of need.

Edelstein: I don't think that can be resolved today.

Nehrt: No.

Betty Demarest: The point has been made that the federal government does not serve private schools, it serves children in private schools. Yet, as I look at the data unit in your report, the unit seems to be the school. Having worked with Joel, somewhat, on inferences of developing legislation, there's always a need in that type of activity to make projections as to the effects of changing the Title I formula, the Title II formula, or any of these formulas. I think it would be useful to have more data on the characteristics of children in private schools, and ideally, data that would tell us, for example, how many children there might be in private schools with handicapping conditions, how many children there might be in private schools that fit something like a Title I poverty criterion. Data related to children in private schools who are participating in special programs, or who are potential participants, would be useful not only for enforcement but for making projections from a policy point of view as to what would be the impact on private schools, given the type of population attending these schools and given different options for changing types of programs.

Nehrt: You introduce a host of complex measurement problems. I'm not saying that there is no solution; I'm saying it's going to be difficult to find the solution and arrive at the proper measures.

Edelstein: One of the problems that seems to be popping up in this discussion, even though the meeting today is to focus on the NCES survey, is the multiplicity of data needs. When we talk about the universe of the data, it may be important not to speak solely in that vacuum. In some way, shape, or form, there is a variety of sources for the data to help make policy, and Roy's survey is just one piece. NIE has done a small sample survey in cooperation with CAPE and a variety of other people; we have population surveys in the Census, and we have the Fast Response Survey System of NCES.

Nehrt: There may be needs for a half-dozen different kinds of very specialized surveys combined with a general statistical umbrella survey.

Edelstein: I think that may be the best way to approach it. Also, we should consider the whole notion of whether we might add more things to the forms. When we deal with our application forms for Title I and Title IV and other programs, are there some items that are missing at the present time that would be helpful to get us some other information? We should talk to Don Chill in the Office of Education about forms clearance before adding anything to forms that might cause difficulty. I think we can make an argument that we've been given a specific time by the Comissioner to do certain things. What kinds of items do we want to add to LEA applications or SEA applications that will help us get the kind of data that we need?

In some way, we have to get a check-and-balance of that kind of data collection system so that we know that we've looked at and examined the data, and we're sure that the information that we're getting is as accurate as we can get. Now, we cannot get 100% accurate data, but how can we maximize the effectiveness of the data collection? There are going to be some things we're going to duplicate. I think, to some extent, that may be beneficial. Because of the helter-skelter fashion in which we've collected private and nonpublic school data, however, we have not, in the past, been able to ascertain many facts and figures. When we were developing the new legislation, at various points someone on the sixth floor in the south corridor of the Humphrey Building would call us with, "I need to know...," and we didn't have the number. We gave them a "guesstimate" here and a "guesstimate" there, but I think we've gotten to the point where we have to have a better sense of what we know and what we don't know, so we can ask the right questions in the future.

A general group of questions concerns the basic facts about the education of nonpublic private school children. Some of those things Joel started to set forth, but there are others: how many students are there? in what grades? This addresses Roy's question--I'm not necessarily stating that we have to survey by grades, but we need to know how many are eligible for the different types of federal programs, and not just how many are eligible for any federal program. Then we've got to relate some of this to the descriptive data that Joel and Betty are talking about. It is important to talk

about descriptive data, because we're going to have to figure out what kind of descriptive data we need (1) to help plan programs better and (2) to be responsive to Congress. I think we're going to get tough questions, and it's not going to be in five years from now during the reauthorization hearings but in the next year or two. I'm sure we'll be going up for hearings. Congress is going to be asking about what we are doing, how we know we've improved the level of private school participation in Title I or Title IV. Are more of the eligible children participating now than before? How do we ensure that? And just because we can say we now have 17 bypasses, rather than 13 bypasses, doesn't necessarily ensure that service is employed.

That's another thing, and I think it is not the type of data need the NCES survey should address. When we do a bypass, we then should do some kind of analysis of bypasses and what kinds of services children are being rendered before and after. There were discussions about different kinds of authorities, and certain senatorial staff, prior to the floor debate, wanted to know what should be done.

One of the things that does appear to some extent in the survey and which Susan Abramowitz at NIE has also looked at in detail is the cost of nonpublic education. I think it will become more critical in the future to get some <u>better</u> understanding of "average" costs for a nonpublic elementary school and "average" costs for a nonpublic high school. I think we're going to have to break it down into better categories to know what the costs <u>are</u> in nonpublic education, both operating budgets and tuition costs. I think it's going to be important in three or four years to get a handle on these things; demands are going to be made on us for that.

In the last week I've been having some conversations with a few people, both at the state level and with one of the persons who works for the Secretary. I talked about the state role in health and education. We haven't gotten very far, because I haven't formulated in my mind clearly what we're striving for. We are just trying to get some notions about eligible children and of duplication of services, where kids get checkups or immunizations two or three times when they only should be getting one. Some kind of scrutiny on the part of a variety of agencies is needed. There are a few states that are

interested in talking with us to try to find out through a pilot run. I think when we start talking about running a pilot, we have certain authority through this legislation that will make it a lot easier to run a pilot than we had in the past. Ultimately, we'll have to talk definitely about eligibility of children across the board.

Lamborn: Leaving aside the question of health, but getting directly to the question of education, there are a number of conflicting programs within the same service area, federal and state programs with the same intent but conflicting rules. Where those programs differ in the ways in which they apply to children in public and private schools, certain policy wordings become very critical to the participation of private school children in federal programs. In compensatory education, for example, the state of California has a degree of flexibility with regard to the apportionment of funds from federal and state sources. Now, if the private school children are not eligible for the state programs but are for the federal programs, then you immediately have an imbalance for the children in private schools. There are a number of direct issues of that sort.

Edelstein: Turning to another topic, I don't think we have a problem of lack of definitions. I think we do have to start being consistent. We have a law that gives definitions or regulations that give definitions, and we're going to have to rely on those kinds of definitions for schools, local education agencies, or state education agencies, as the basis for assessment. Perhaps I'm being conservative, but I believe that we should use the definitions of schools and local education agencies that we have been using for the other programs as the basis for collecting survey data.

There are going to be data needs in some other programs, and Roy just brought up the question of where do we start: only with kindergarten, or grade one, and go through grade twelve? Perhaps it will be necessary to gather data on schools for very young children, because there's a special preschool partnership project in the new law. We're dealing with a Head-start kind of a program that is going to be tied into preschool partnership; also, we have Follow-Through. As much as the Administration has tried to say we are phasing out the Follow-Through Project, Congress has continued

to fund it at a level that doesn't look like it's phased out at all. It's become a reality on the part of the Administration that Follow-Through is not going to fade away, even though we may have some new directions and some new projects that get funded in the future.

Silverman: Would you amplify this? It seems to me that we have always had for a number of years, in Title I, IV, and others, a preschool authorization. We get many questions from private school administrators about possible preschool activities. I was thinking, as Roy was talking, of the implications of limiting the survey to only schools that have higher grades involved. Maybe sometime we may have to take full survey of nursery school or preschool activity.

Edelstein: The language in the bill is fairly specific about what children are eligible for this program. Although this program is now authorized, it has not been appropriated for--although, if there's a percentage in for the preschool partnership, say 5% or 10% of special projects, we know that special projects will be appropriated; and therefore there will be some appropriation for it. I think that is going to be a signal whether or not we will want to collect data on that age-group of children.

Silverman: Can you briefly describe the preschool partnership?

Edelstein: Let met just read from it. It's a very short, one-section, Section 325 of Title III:

> The Commissioner is directed to establish in cooperation with the Assistant Secretary of Human Development of HEW a program of cooperative pilot projects between the LEAs and Project Headstart, as authorized by the Headstart/Follow-Through Act, which will provide a smoother and more successful transition to formal school for certain preschool-age children and thereby improve their long-term achievement in elementary school. Projects established under this program will be designed to achieve the purposes by (1) providing to a limited number of children, aged three to four, inclusive, of low income families and to their parents, families, or guardians, a program of educational services including instruction, counseling, and testing, to be conducted primarily in the child's home; (2) providing to children and adults who

> have participated in the services described above, during the following year, appropriate educational services, testing, and counseling, primarily conducted on the premises of an elementary school... .

And so on. There's a potential. If it's 10% of the funds for Section 303, then they're probably going to be funded.

I'm not saying now that we have to charge ahead and do a survey on this--don't misunderstand it; but we have to think about programs not just in the pure vacuum of the Office of Education, but rather whether, to some extent, this may be going too far. We have to think about how programs fit with each other and work with each other; and it may be beneficial for planning and policy to know about those children that are coming up. I'm not talking about necessarily surveying all the nursery schools; that goes to the other extreme. (I don't think we could ever do it effectively.) What we need to do, however, is think about it. If we're going to do any projection, or have any notion about what the private school population is going to be in the future, we may have to do some small data collection, based on these programs and maybe a couple of others.

Goldstein: The question of including preschool data is of interest to NCEA. I was going to get to this later, in response to Roy's question about the grade-by-grade enrollment. Should we continue that; and if so, since we are now serving preschool children in our schools, should we include them? This is one of the important aspects as far as NCEA is concerned. We do have our own data collection systems and some summaries of the surveys. One of the things that we have left out in the past two years is a grade-by-grade enrollment, because we were already asked this in the NCES surveys. Now, for reasons of projections, I realize when you're talking about federal programs, these children are going to be someplace--in private schools or public schools. We're interested in knowing how many eligible children are in private schools, and a grade-by-grade enrollment would certainly help us with projections. It's something we're anxiously awaiting and have not yet gotten. We would like to do an analysis of that, whether or not NCES does the analysis.

Lamborn: Well, it would not be possible to work from projections that are of the general student population nationally and predict that in the private school. This is because you have trends which are quite different internally within the segments of private education and they're different between private education as a whole and the general population.

Edelstein: To continue, one other reason for getting some better data is monitoring, which we talked about before. Who is and is not being served? The financial part that Joel spoke to and I spoke to briefly is the most difficult part. It bothers all of us. I know that it bothers people in the private school sector, in conversations back and forth. How much is being spent on each private-school child for education? We need to get a notion of the amount of money that is being used to serve those children. I'm raising the question: Is there a way of getting these data? I don't know; there may not be. This would include the notion of how many hours of service the child is getting, the types of teaching they're getting, and the types of services they're getting. I throw it out as a word of puzzlement rather than as a solution to the problem. I'm not sure it can be done by NCES. It may be possible to get some notion of the answer from a small short kind of survey. We're looking at it in Title I, considering whether it can be done as a part of the normal Title I evaluations that are done by the state.

Bredeweg: We've already done it on the secondary and elementary levels for Catholic schools, at our own cost, for the last couple of years. Now, it's not the best, and this area has been difficult, but if you know how to read it, you can get some sense out of the sample. It would be much trickier in Bob's [Lamborn] schools.

Lamborn: We can do it in subsets. What you can't do with any of these things is deal with them in the aggregate. If you start meshing them, then you get a situation which is problematic.

Bredeweg: We took every secondary school questionnaire, every Catholic high school and secondary school. (I personally reviewed them and looked for those who answered the financial question.) While you may say that you

don't understand why those answers are poor (and they are), when a school can make the distinction between general operations and auxiliary services, and do it accurately, and it looks rational, then I figure that they have good enough accounting and management to report more answers. They do. I went back, and we now have 200 out of 1,600 Catholic schools where the report contains much more detailed information. We did a report on Catholic high schools and finances. On the elementary level, as they came in, we computed the costs, dividing by number of students. I'm not saying that we always got the best information. We also computed the pupil/teacher ratio to get an idea of class sizes. These are things we're doing with that information, at great expense. We wanted to do it for at least a couple of years until we could find out whether the questions could be answered. The results indicate that a lot of the questions that you are asking are answerable.

We now have three years' basic data on how many students in this school participate in that program, although without any degree of quality evaluation or any information on the type of participation. In my opinion, you have all you need right now as a data base on that question. Now, if you want to know what our schools are doing on public programs you have to look to the concentrated areas, do some playing with that information (i.e., find the concentrated areas and do a different kind of study). This should not be a pure data study--that won't tell you anything that you don't already know.

Porter: We don't really have numbers of students involved in programs, though; we have numbers of schools. We know which schools have these programs involved, but we don't know how many students in the schools are involved.

Nehrt: One of the things we've found in our experiences is the need to identify erroneous responses. We had some rather loose editing requirements in the 1976 survey; and as we got the survey forms in, got them on tape and started machine editing, we had an enormous number of edit checks that delayed the whole process. We attempted to tighten up the edit specifications in the second year. We have probably 60 to 70% fewer edit checks

on this last year's survey than we had before. The key to this, as Frank [Bredeweg] was saying, is that NCEA and the other CAPE constituencies can look at those forms and "smell" bad data. We can't, really. I don't know whether the expenditure per-pupil in the Catholic elementary school ought to be $395 or $995, because I don't know whether they have a larger proportion of religious or lay staff. For the parish that I live in, the per-pupil expenditure will be much higher than a parish school that has predominantly religious teachers. Those are the kinds of things that can be "sniffed" out at the source. The returns can be evaluated very quickly and you can identify the schools that are giving you "good" data as opposed to those that are giving you very "mushy" or very inaccurate kinds of data.

Bredeweg: I see. I'm just saying that in the example where you looked at a questionnaire that had $200,000 income and $600,000 expenses, that may not mean anything to you; but if I see it is a parish elementary school, then clearly they didn't report the parish subsidy. That is their practice. That's what they did. It's only tuition and fee that they put down.

Member of the Audience [inferred]: How does this survey relate to the overall federal data base on private schools which has been mentioned?

Edelstein: You want me to answer that? One of the purposes of this meeting is to evaluate such issues. There may be things that we cut out of this survey and add to the survey effort it finally leads to. Part of the reason why the meeting is being held today is to find out what we want to do in the future. I'm not ready to say what the interests of the Commissioner are in terms of what various members of the staff need.

Nehrt: I think the ultimate solution is going to be a high level of coordination. Conceptually, I perceive a series of special purpose kinds of surveys. Certain kinds of data may be required on application and annual report forms for the various programs. All of that may be covered in an umbrella kind of survey such as this. If there is not a sufficiently high level of coordination and integration, however, then we can forget about it. Let's consider as an example a very simple matter. If the people who are going to gather data, for whatever purpose, from private schools, can't

agree on some kind of identification number by which they can match schools between their data bases, then all we are going to do is waste an enormous amount of additional resources when we try to merge these data bases. You've got to start with a top-level coordinator, who is going to be aware of every data collector who is trying to get some data from this sector and make sure that each designs his collection system in such a way that it can all be integrated, matched together, and merged. Then, I think we're going to have a very powerful data base--but having 15 different data bases that can't be put together just wastes resources that we can't afford to waste.

Member of the Audience: Who would be the coordinator?

Nehrt: Somebody who will assume the role of chief "headknocker," who is given the necessary authority to say, "You're not going to do it that way because it won't fit with what he's doing."

Lamborn: And someone, in addition to that, who can create an easy,, working, cooperative, openface relationship with a variable group of institutions, some of whom have to be approached in very special ways in order to get their cooperation. I mean, there's not only the problem within the federal education establishment, but there's also the matter of creating a capacity to produce the information.

Silverman: Do you have some feelings at this time as to whether the Education Division needs to know about eligibility for the services every year?

Edelstein: No, I don't think so. I think that's something you may be talking about with the descriptive data every two or three years.

Silverman: At the national level and at the state level?

Edelstein: That's a good question.

Silverman: At the federal policy-making level is there a meaningful distinction between NCEA schools and all other types of schools?

Edelstein: I have a sneaking suspicion that there are people at most levels, including the higher levels, thinking about private education, whose perceptions of private schools are such that the first thing that comes to mind is the parochial Catholic schools. That's just a guess; it never came out in conversations. I think that the notion about having something every two years may be all right, rather than something every year. We may end up extending it to three years with the paperwork provisions and with state applications in Title I and Title IV to do now every two years.

Silverman: With respect to other issues, I would also ask the question about the frequency of the survey.

Edelstein: I have the sneaking suspicion that we're not going to be able to do things every year; we need to figure out whether two or three years will work out best. I think that fits into what kind of questions we are going to be asking, and why we're asking those questions. I don't think we're going to need descriptive data every year, though.

Silverman: It sounds to me like the next renewal legislation will be in 1982, unless something unexpected comes along, and if we're lucky we can have the data you're talking about available in 1981.

Jacobs: One thing I'd like to talk about a little bit later is related to this. The Current Population Surveys do provide some of the data we're talking about here in terms of who goes to private schools, by various kinds of characteristics. They're even going to be collecting some tuition data. I think that answers your question, because that survey does go out every year, and it's a source outside of the nonpublic school survey that certainly ought to be utilized. We can possibly even avoid some of the difficult problems in asking the schools for that kind of information, since it is a household survey and it may deal better with difficult problems such as getting information on who was served, by such things as race and income.

Nehrt: I think that's a good point, particularly when it comes to family income questions. There is a much better probability of success in a household survey than in a school survey.

Meaning and Significance from the Perspective of the Assistant Secretary for Planning and Evaluation (Marty Jacobs, Office of the Assistant Secretary for Planning and Evaluation)

As Fritz and Joel have discussed, Congress has identified, in this past session at any rate, two primary federal concerns with respect to private schools, one of which has already been talked about quite a bit. That's the extent to which the private schools are currently participating in federal programs. Second, what should be the long-range federal role with respect to private education? We saw concern for this on the tax credit proposals. I'm sure it will come back again. Also, as Joel pointed out, the Ed Amendments of '78 mandated a study to look at private schools and make recommendations or explore alternative federal roles and the impact of those roles. What I'd like to do is talk about four kinds of policy issues that relate to these two larger concerns, about helpful approaches that have already been taken in analyzing the issues, and about what kinds of data exist and what data need to be brought to bear on these issues. Much of what we know is the result of information we've gotten from the National Catholic Education Association, and I would appreciate your suggestions of other sources.

The first of the issues I'd like to talk about is the extent of existing federal support for private education. That's the focus of the Ed Amendments in their regulations with respect to participation. As everybody knows, during the tax credit debate there was a lot of controversy with respect to these estimates and the extent to which private school children benefit from federal programs. Some of that stems from the fact that the programs, themselves, were not allowed to ask particular kinds of questions on their applications. As a result, as everybody I think discovered, no reliable estimates really exist. We have had to make certain assumptions and come up with numbers based on those assumptions; and the results ranged from the high of 100 to 250 million dollars, that we were citing, to a low of 54 million, that the Catholic Conference cited. Where we do have data, it's based on participation rates, and for the assumptions about the per-pupil level of support, we were all just guessing. Unfortunately, all we could do was to get as many people guessing as possible and come up with whatever seemed to make sense or supported a particular position.

Secondly, more than just federal support, there's interest in finding out what kind of other governmental support goes to private schools. For example, we know that state and local governments provide certain kinds of support. They vary from transportation for private school children to textbooks and services, but there's just very little quantitative information on that, as far as I know, and we've checked a number of states. People can make estimates for particular states--but that's about as far as it goes. We can't very readily compare states. Another aspect of this issue is the estimation of benefits of various tax policies to private schools. This is certainly one area of policy concern.

The next three issues, which relate directly to aid to private schools, are perhaps more relevant in deciding the long-range federal role with respect to private education. One of the policy questions that's going to come up is just a simple question: Is there a need for federal aid to private education? Traditionally, the argument has been that as a result of declining enrollments, rising costs, and diminishing sources of support, private schools have been characterized as in danger of extinction; and federal support is seen as necessary to ensure that that does not happen. One of the things we can look at now, and I think pretty well, is the enrollment status. The data on enrollment is probably, from what I have seen, the most available kind of information that exists, particularly if you're talking about a national level. We've got the NCES survey, and the Declining Enrollments book provided information on this. Also, as I mentioned earlier, there is the Current Population Survey (CPS), as well as other census data. Right now, we're trying to work with Larry Suter at the Census Bureau, to get the CPS data tapes together--so that we can do some kind of time-series analysis. With the CPS (it's compiled yearly) you can be fairly sure that you're getting consistent data; whereas if you try other things (we explored going back as far as '60), you have to use the census and then mix it with the CPS or whatever kind of data, and it's very difficult to be consistent. We plan to use the CPS data on enrollment for calculating time series on private school attendance by such characteristics as family income level, where they're located (whether or not they are in cities, suburbs, or rural areas), the race of the students, and level of parents' education. The last one seems to be a quite significant factor affecting whether students attend private schools.

This will allow us to know who's sending his or her children to private schools; and it may avoid some of the problems in asking this data at the school level, because it is a household survey. I think this makes some of the data a little more reliable--if there's at least some uniform standard in the way it's recorded. We will then be able to look at who's currently sending his or her children to private schools and whether there are changes in the composition of private school enrollment, as some of the debate on the tax credit might seem to indicate. It appears that this time around there was a lot of support for tax credits. We were seeing support for the tax credit proposal from sources which have typically opposed it in the past. For example, you had Roy Innis from CORE standing up in favor of it. Other segments of the population are now seeing private schools as a very necessary alternative to the public schools. To really get at that issue, we need to look somewhat closely at the changes that are going on--not just at the overall, "broadbrush" kinds of information but also at the minor changes that are happening. I think that gets to the question of whether we can rely on the Catholic education data. I think that's very good when you're talking about overall trends, because, predominantly, it's the largest portion of the private-school sector; and if you're just trying to get at some kind of overall notion, that's fine. On the other hand, if you're trying to make some predictions about what's going to happen in the future, it's also important to look at some comparisons of their experiences with those of other private schools, and that's little hard to do now, because the data are not very readily available, particularly with respect to nonaffiliated schools.

Second, when they're talking about the needs for federal aid to private education, they talk about fiscal crisis. And while we have some good data on enrollment, the fiscal information is a lot less sytematically collected. We've used Father Bredeweg's data--that basically is the most that's available in terms of the financial status of private schools, at least as far as we know.

Goldstein: There are data on secondary schools. We have two reports out. I think it's safe to say there's substantial volume of additional data which are non-Catholic, which you haven't gotten to and which we should talk about.

Jacobs: Oh, I'd love to. I've been trying to get at a little of it. That's been one of our prime areas to get a handle on. What we want to look at with these data are several factors—first there is the fiscal condition, both past and future, of the private schools. Also, to what extent are costs increasing, and what factors are accounting for this? For that we need to look at the data on class size, teachers' salaries, what the training and experience factors of the teachers are, and how that's been changing. I would think that given the oversupply of teachers, we're having more and more educated teachers, and I think that's probably going to result in some pushes for salary increases, as well as, particularly with respect to the Catholic schools, the extent to which they're shifting to lay teachers as opposed to religious orders.

Another aspect of the fiscal issue concerns revenue data. What are the sources of income for the private schools? The NCEA data that we have seen have shown that the Catholic schools, for example, rely more and more on tuition as opposed to subsidies. Some questions that could be asked, particularly for the future are: To what extent are the parishioners going to be less willing to subsidize the private/religious schools, if in fact the schools tend to be serving more and more students who are not Catholic children? Also, what are the tuition barriers above which people cannot or will not pay to send their children to private schools? I think there's just very little information on these kinds of questions, but that information is needed in order to assess the need for another source of support, namely federal.

Finally, if one could predict a period of expansion in private enrollments, in terms of the interest of people in sending their children to private schools, what kind of costs would the schools face? Would the costs be prohibitive, in terms of private schools having to go out in the open market for buildings, for equipment, with less reliance on contributed services? That seems to be the climate, if I'm not mistaken.

The third issue that I want to talk about, and it was debated throughout the tax credit thing, is if you provide federal aid, who benefits from that aid? Second, what kind of response would that aid evoke in terms of people

pulling their children out of public schools and sending them to private schools? The second question is pretty much conjecture--and a lot more difficult to answer. Lack of tuition data, particularly tuition data by income level of the parent, makes it pretty difficult to determine how benefits from the tax credit would be distributed. There is a little bit of hope on this, for working with the Census, we were able to include a tuition question on the latest Current Population Survey--the one that's going out right now. From that, we'll at least be able, for this year, to get some income breaks for tuition level and also breaks by race and metropolitan status and overall level of school (elementary or secondary). I don't have any sense of how good these data are going to be, but I expect they'll probably run into similar kinds of problems that you have in terms of, for example, separating things like boarding fees. On the other hand, what it will do is to allow policymakers to come up with a pretty good perception of who would benefit from a tax credit if it were to be made today, in other words, without predicting who would respond.

Secondly, this kind of information might permit some, I guess probably pretty crude, economic modeling to estimate responses based on such things as income level, number of children, or the size of the tuition. Hopefully, this will allow some predictions to be made as to what role, for example, tuition level does play in people's decisions as to whether to send their children to private schools.

Fourth, and I guess this is the most difficult issue of all to get at: What is the effectiveness and quality of private education, particularly when you compare it with public education? For example, do private schools provide more in terms of educational achievement and outcome for the same dollars of expenditures as public schools? Given that we don't even know what the dollars of expenditures are, it's pretty rough to say, not to mention problems in assessing educational achievement. Systematic data on this just generally are not available, and there's not even agreement on what would constitute proof that private or public schools are better. Some things that can be looked at are class size, teacher-training experience, level of course offering--some of which the survey does address already.

Really the only national data base that we have now are the Anchor Test studies that were done several years ago. What data there are indicate that, for example, children in private schools, controlling for IQ and income level, seem to be scoring higher on reading and math tests than children in other schools. That brings up a lot of issues as to why that might be: Is it a preselection process, or just exactly what kind of factors do contribute? These are all issues that need to be addressed and have been addressed, in the debate about what the federal role should be in the future of private schools. Basically, those are the kinds of things we're looking at in terms of making policy.

Simms: There are plans for enabling the 1980 Census data to be directly disaggregatable to school-district units. Linking with these data should provide a very rich source for policy issues.

Member of the Audience: In terms of data needs of HEW for federal policy, I don't know whether we want to know any more about the Christian-school movement, but it seems to me that, at least as reported by various media, there's a suspicion out there that there's a greater growth in their enrollment than we realize , or know about, or want to know about. Some of the leaders in some sectors of this Christian school movement are claiming as high as a million students, or close to it. I don't know what Roy's latest survey will show. It's hard, because some of these schools that are Baptist or Methodist go under an umbrella of Association of Christian Schools. Really, we don't have much of an idea of how many are there, but it seems to me that we ought to have more of a feeling than we have now. It is also a feeling of many that these are still segregationist academies. I'm doubtful myself that that is true. Also, there are more and more alternative schools being reported out of Chicago and the West Coast. I realize that is a rather small group, but it's interesting the kinds of things they are doing and the kinds of population they are serving. They get grants for juvenile delinquency, truancy, those kinds of things, and none of these schools would be outside the realm of an appropriate definition of school.

Member of the Audience: Marty, can you say something about how many private-school households you expect to pick up on the CPS?

Jacobs: I'm not very good on this. Let me see if I have that.

Member of the Audience: Do you know how many households there are to begin with?

Nehrt: It's around 50,000-60,000 households.

Member of the Audience: About 10% of children are in private schools, or about 5000 students.

Goldstein: You should realize that parents do not necessarily send their children to private schools in the school district. Also, I've always been fascinated with what these SMSAs mean. We even talked about it when we were setting up to do the survey.

Nehrt: The SMSA is an arbitrary boundary that was set up by the Census Bureau. It is a city or two adjacent cities, having a population of 50,000 or more, plus the more densely populated areas that surround that central city. Now some of SMSAs will include large rural areas; others will not. Zip codes, on the other hand, were established primarily for mail sorting and have no relationship to any other kind of geographic boundary. For example, FOB 6 has its own zip code, 20202. There are some counties in the surrounding areas of Maryland that will have a Washington, D.C. address and a Washington, D.C. zip code. There's almost no way that you can relate zip code to any other geo-political boundary.

Silverman: Roy and I have talked about adding to some future private-school form the public-school LEA identification number for the place the private school is located. The way it is now, we really have no possibility of comparing them on a geographic basis.

Lamborn: That's going to be one of the things I'm going to urge later on. I think there has got to be some kind of way to tie in the LEAs.

Berke: There is a consideration that is relevant to Marty's comment. It was raised with me during the break, and that is the interpretation of financial data on the private school sector and the comparison of it with the public school sector. When in the Catholic schools we have, in effect, the contributed services of people in the orders, a mention was made to me of the nonmonetary income that brings people into some of the private-school teaching situations. Now, we say the same thing is true in the suburban schools versus inner-city schools. This whole question of whether dollars mean the same kinds of things in private schools, as opposed to comparisons with the public sector, needs some consideration. On a survey form I'm not sure how you deal with it, but in terms of the kinds of analyses that are required by 1203, it may be important.

Lamborn: You have to be consistent with such things as debt payments, central office expenditures, and so on--many of which items aren't carried in the per-capita costs in public schools but obviously are carried in the private schools. You've got the mission situation not only in the Catholic schools but in almost all of the other church-related schools. How a school gets financed and what those figures mean is extremely complicated, and it's very dangerous to make the easy parallel implications out of those variable sets of figures.

Nehrt: I think it goes beyond what Bob, Rhoda, and I were talking about. For example, if the arrangement in a parish school is that the tuition will be $25 a month total, assuming you put $10 extra a month in the place, you're going to have a lot of difficulty breaking that down, because that extra $10 a month I can deduct from my income tax; the other $25, I can't. Now, IRS is looking into that, and they may put out some new guidelines before long that would, in a sense, prohibit it.

Lamborn: It's been prohibited for years, Roy!

Nehrt: It's been prohibited but it's an unenforceable prohibition.

Lamborn: As long as the parish supports the schools, there will be that pass-through of subsidy.

Nehrt: Then it's a question of how much of the collection plate went into the school support; and how do you get the schools and parishes to report that accurately? We really need a series of intensive discussions to see if a methodology can be developed.

Lamborn: Also, we get involved here with the whole church-state separation business, which is crucial.

I'd like to toss one other thing into your consideration of school finances. I think we ought to be very careful to look at the generation of funds by the private schools for the support of American education. The private schools generate about nine billion dollars annually for the support of American elementary and secondary education, and that's more than twice as much as the federal government generates. Furthermore, when you look at the major metropolitan areas, and you have enrollments that push 35% of the total pupil population, and that's financed out of private funds, that needs to be recognized in urban school finance studies.

Marty: Yes, also, the Section 1203 studies include one looking at the impact of private schools on public-school enrollment. Well, maybe this is not exactly on target.

Lamborn: That's quite different! That's the threat to the public schools.

Edelstein: Well no, that's the way you look at it. I would look at it differently. What is the impact of children going to private schools? Maybe I'm misinterpreting what you said, but the amount of dollars that are generated by nonpublic-school parents paying taxes has an impact on the (public) school system, and it may be negative or positive.

Lamborn: We're not saying the same thing. I'm saying, you take all of the children attending American schools. The finances that support 10% of those children are generated by private institutions, and that fact needs to be recognized. That's different--it has nothing to do with funding of the public schools.

Kraushaar: Parents of the children who are in private schools also pay taxes for the support of public schools. You also have the private school situation as a definite plus on top of the amount that you have to spend for public schools.

Marty: I guess that's more the issue that the school finance studies address.

Lamborn: I guess I'm trying to say that the American educational system is supported totally by both public and private funds and that you need to look at the total educational system and the total contribution of both the public and private sources, if you want a clear view of what makes American education self-supporting.

Bredeweg: May I comment on your presentation. I agree with the questions you are asking. For the first time you're getting very close to the questions that we're asking. In regards to the financial comparisons, it's difficult, but it can be done on the secondary level right now; the elementary level is more complicated. The salary scales of the public-school districts are generally higher than the Catholic-diocesan scales, across the country. You run into the problem, however, of whether public-school salary scales distinguish the elementary and secondary teachers. Our surveys assess operating income and expenditures--I tell the respondents to forget about the capital expenditures, just report normal, annual recurring operating expenses.

Nehrt: Are you saying, in effect, Frank, that possibly we could collect the quantitative data that we need to answer some of their questions, putting aside the quality-of-education kinds of notions? Could we collect the kinds of financial data, the kind of enrollment data, perhaps some program data, that is needed?

Bredeweg: Financially, not on the universe, but on the sample [of 200].

Nehrt: Could we identify a group of schools within the universe that could provide accurate financial data and estimate from that kind of a sample?

Can we identify the kinds of biases that might be inherent in that method? It's not a random sample, and it's not a stratified sample; but, it is a sample of school districts in which there are schools that can report good data. Could we inflate those kinds of data to state a national estimate within reasonable limits of precision?

Bredeweg: Well, that's what we just did, for secondary schools. We did it for elementary schools too, but I'm not too confident about that.

Kraushaar: In that connection, I think that an important measure not included on the present survey form is the amount of indebtedness a school has. I've just recently been studying a group of private secondary schools, including church schools, in Baltimore; and the problem here is that the debt is extremely important. The debt is usually an accumulation of annual deficits, and it's a clue to how far that particular school is "down the river" as far as survival is concerned. The figures are extremely difficult to get, because many times the indebtedness is actually not carried by the school but is carried by a congregation, or it is "earmarked" as loans from a diocese. As a rule, the nonaffiliated schools have a clearer picture with respect to their debts, because they have no other body in which to bury this indebtedness. I want to emphasize the importance of the indebtedness factor; that is what eventually "kills" the school; it isn't just one annual deficit or two, but it's six or seven in a row.

Nehrt: We have the same problem in the public sector: legislative debt limits. A number of states have had to go through a variety of mechanisms--special revolving funds, school housing authorities, and so on. You have a very similar problem in the public school districts: They're up to their debt limits, they have no children that they can adequately house, and there's no place for them to go. Then they start imposing tax limits, or reducing tax limits, till the problem is merely compounding itself in a lot of places. I would agree with you: If your debt service payments are $200 a year per child and you can't acquire enough revenue, then your only choice is to cut back on services or quality of services, increase class size, or whatever.

Kraushaar: Many private institutions, both colleges and secondary schools, operate on the basis of, say, a two- or three-year period in which their tuition remains constant: The first year, if everything goes well, they have a slight surplus; then the next year, because of rising costs, they may break even; then the third year, they have a deficit. Then they revise their plan. This works fairly well in somewhat more normal times; but I discovered, for example, that in our national study about 1/3 of the schools were without indebtedness (this was back in 1969), another 1/3 had moderate indebtedness of the kind that could be covered by tuition raises, and 1/3 had over $100,000 of indebtedness. They were small schools, for whom $100,000 indebtedness is such a serious amount that they would probably go under in a relatively short time. Thus, it's a factor that affects a certain segment of the private school world and not the whole of it.

Lamborn: Now, there is one other general thing I think we ought to keep in mind, and that is that while the Catholic schools enroll 70-75% of the total private school population, it would be inaccurate to extrapolate from the Catholic-school experience to all elements of the remaining non-Catholic private schools.

Jacobs: That is true. For example, enrollment is increasing, in some cases pretty dramatically, while the enrollment declines have probably been more in the Catholic sector than the other private schools.

Lamborn: "Parochial" means Catholic, and "school" means public. That's what happens in the public.

Jacobs: Sure, and I think that's particularly important, as I tried to point out earlier, when you're talking about what the future sources of interest in terms of private education are going to be, especially with things like vouchers and tax credit. We need to know what is going on right now in order to estimate what might occur given the impetus of a tax credit or a voucher.

End of Morning Session

Introduction to the Afternoon Session (Marie Eldridge, Administrator, National Center for Education Statistics)

Unfortunately, the very untimely death of Julie Shiskin, the Commissioner of Labor Statistics, prevented me from joining you this morning. I'm sure that, if Julie had been around to advise me, he would have suggested that I continue with the business of the day rather than pay him the obvious homage that was his due this morning; but that was my decision. So, belatedly, I want to welcome you to this first seminar on analysis. It is very encouraging to see the wide representation that we have in the room, and it's particularly encouraging to find that you were able to secure the service of such illustrious people for our panel. We are just delighted that you were willing to take a full day to deliberate these very, very important issues with us.

The subject that you are discussing is, obviously, of great importance to NCES and also to other segments of the federal establishment. I think that you probably concluded this morning that it is of great importance to educators, parents, and to students as well. I think that we are in an era where there is considerably increased emphasis and interest in the role of nonpublic schools; and it is therefore extremely important and appropriate, at this point in time, for NCES to address the specific analysis problems and issues in the nonpublic sector as our first seminar on analysis. I understand from Les and Abby, who briefed me on this morning's session, that the discussion this morning was active, candid, constructive, and friendly. Nonpublic schools are probably the best example of a viable ecumenical movement that we have recorded in history, and therefore I think it's extremely important that we discuss the issues as openly and candidly as we possibly can.

I do want to stress that, while we are focusing today on nonpublic school issues, NCES has a very broad role, as you well know, as the agency responsible for collecting and disseminating the basic data on the condition of education in America. Obviously, nonpublic is one very important sector, but the importance of today's seminar is really much broader than just nonpublic. What we are basically doing today is establishing the prototype for future seminars

which we expect to conduct in the Center, through which we hope to enhance our own analytical capabilities through interactions with the people who are out in the field, as well as people within the various departments of the federal establishment and SAGE.

We hope the seminar will address the issues and call our attention to the legislative and programmatic areas that really should be addressed, in terms of the data that we are collecting. Decisions that can be made with data--I happen to have a personal bias--are better than decisions that are made without data. I'm very much interested in the outcome of today's seminar, both as the administrator of NCES and as a consumer of the private or non-public educational system, with two children down at the Cathedral School here is Washington; but, obviously, we are also dedicated to excellence in all segments of education, and for that reason I think it's teribly important that the proper perspective be placed on our analytical efforts. That's really what you're trying to do today.

Procedures of the Nonpublic School Survey (Joanell Porter, National Center for Education Statistics)

As stated earlier, the quality of the data has improved greatly since the 1976-77 survey. We're in the process right now of machine editing. The number of errors has been reduced by at least 70% from last year, and we find about 90% of the remaining errors are in the financial data. There seem to be very general indications of care in filling out these forms, and we're looking forward to better results in 1978-79. I'd like to cover some of the problems that we did find.

As we reviewed the data of 1976, we had problems in directory data, and in Item 1 all the way through Item 12.* We found that in the first 11 questions we were able to find other sources that helped us in filling in missing data, and we found that we were able to clear up a lot of the problems. In the 1977-78 survey we have had very few problems with the first eleven items. For Item 12, high school graduates, in 1976 we found it extremely hard to get a boy/girl breakdown. This year we're getting a breakdown in the secondary schools for this, and I haven't seen any of these data come back for corrections. Item 13, on the enrollment, was a great problem to us. In '76 we tried to get a breakdown by sex by grade, and we could not get a sex breakdown at all. In most cases, we could not get a grade breakdown. We were only able to get just the total enrollment in most cases, and in a lot of cases we did not get any enrollment at all. We were able to go to some other methods that we had to find enrollment, and in most cases we were able to fill this section out. So, in '77-78 we eliminated the male/female breakdown and just used the number in the grade. This year we have been getting a breakdown by grade, and the responses are very good. In Item 14, the classroom teachers, in '76, again, we could not get any male/female breakdown. We got totals and about 30% of the schools refused to respond at all. This year, we're getting the breakdown, and the staff data on teachers looks very good. Item 15, obviously, is our problem area. Although we have more schools reporting their total expenditures this year, we are still not getting the financial data that we had hoped to get. We also have certain

*A copy of the survey form is contained in Appendix A.

school systems that prefer to give you aggregated financial data on the whole system, which you can't break down by schools, for example, the Seventh Day Adventists and some Christian schools. I'm afraid the financial data are still a problem at this time.

Member of the Audience: Of those people who report financial data, do you have any idea how they allocate their tuition and fees between current operation and total operation?

Porter: No, I don't. As a matter of fact, you'll only get their total expenditures. There's no breakdown at all.

Kraushaar: Did I understand you to say that these two groups--the Seventh Day Adventists and the Christian Schools went in as a group?

Porter: Yes, they did.

Kraushaar: Which group of Christian Schools were there, because there are four that I know of. Do you mean the Christian Schools in UCS.

Porter: Yes.

Kraushaar: Well, there are at least three other groups. And the Adventists insisted on going in as a group?

Porter: Yes.

Kraushaar: Were any efforts made to get in touch with the heads of the organizations to explain what the prupose of the survey was?

Lamborn: The answer to that is, "Yes." During that survey year, the Seventh Day Adventists were members of CAPE. They have cooperated by sending us a special response which provides for consolidated reports for each of their regions, but they were very loath to come up with information on a school-by-school basis. They gave it so that you knew how many schools were reported in a particular area, with the list of schools, but not putting them together. They're very hesitant about giving anything more than that this year, although we had a series of meetings and conversations about it.

Porter: To continue with some of our problems: In 1976 we tried to survey some 20,000 schools. We got about 14,000 responses. Through follow-up procedures, we raised that to 17,000 responses. In '78 we had over 14,000

respondents to the mailed questionnaire, including 1,000 Seventh Day Adventist schools that responded as 52 aggregate conferences, and we found another 4,000 respondents after we went through the telephone calls. We added a segment to the contract for CAPE and NCEA that called for them to call the schools that did not respond. We were able to get a response from all but about 1,500 nonrespondents. Now, we've improved. We find that the survey is going very well, and we're able to clear up some of the problem areas. The new survey should be a lot more accurate. We should get a lot more and better data to analyze. We're hoping for a great improvement in the 1978-79 survey, except for the financial data.

Eldridge: Joanell, did you have any feel for why you couldn't get the boy/girl break on Item 12?

Porter: No.

Lamborn: In the CAPE schools, which we know, and probably the Catholic schools as well, there's substantial concern on the part of some of the respondents as to whether this information should be provided. In the same sense that there were questions about what legally you could say about race, there were also questions now about legally what you can say about sex.

Eldridge: The segregation of the sexes?

Lamborn: Right. This was part of the problem, and a number of schools just don't keep the record that way. They keep a record of students, and they don't break it down themselves by sex. They do know when they walk in the classrooms whether they are boys or girls, but they don't total them as subsets in their enrollment.

Porter: They are doing it on the survey this year. We found great response on boy/girl breakdowns this year.

Lamborn: I think the simplification of the question helped.

Noell: Let me ask a general question to the seminar. Do you think it would be productive in terms of getting financial data to go out with a sample that could be more intensively followed up and during which, perhaps, some of the schools could be given greater assistance in compiling the

financial data? Do you think that would help in getting a better picture of the financial side of each school?

Lamborn: I think you've got two kinds of problems: One has to do with confidentiality for church-related institutions--financial settings and that kind of thing, and the other with the availability of information. I think the Catholic experience there is the best one to state.

Goldstein: The more we talk the shorter my report is going to be, but one of the things I want to propose is a solution to our financial problem. I don't know if it is one that everyone is going to be happy with, but I'm going to suggest that we no longer include any financial information in this survey. There are several reasons for it. One is that the Catholic schools are being advised not to supply information of that type for surveys of this type where the school is identified. We have no problem gathering that information from NCEA. We report it on a national basis, sometimes on a regional basis; and we don't need to report it on a diocesan basis. Everyone is pleased to live with that, and it's not a problem for us. The NIE survey is now running into problems of noncooperation, and it is because of the confidentiality of this type of information. I know that they are being advised (not from our office) not to answer that question, if they ask. No-one is going after them to tell them not to, but if they ask, then the advice given is "No, don't supply that information." So, part of what I was going to suggest is that when you're after financial information, NCEA can supply what you need to know, but it will not be available on a school-by-school basis.

Silverman: That raises the important question on our side, "Whether we use it on a school-by-school basis, or whether that would simply be a device for aggregating the data to some higher level." We have to look at that.

Goldstein: We could not report financial data on a school-by-school basis. We do not collect it school-by-school. We have a diocesan summary form and we collect it from the diocese. Not every year have we collected financial information. Now, we have gone into it last year and this year, because there was so much interest, especially because of the tax credit. Government agencies were calling us, and we were giving them all kinds of

ballpark figures. I guess you're always dealing with that problem, but we feel that we have a much, much better and truer estimate now. Now the schools are running into all kinds of legal problems. They're running into problems with IRS. They're running into problems with their nonprofit status. Of course, that's not based on financial information, but these are kinds of legal questions that they're all looking at.

Silverman: Do you have reason to believe that we can get it on a diocesan basis?

Goldstein: Oh, yes. We report it nationally; we don't report it on an diocesan basis, but that's how we get it.

Eldridge: I don't know what the diocesan break would do for us. It doesn't merge with anything else that I know of.

Silverman: I am really thinking of states. Do you think it would be possible to get the financial data aggregated at least down to the state level rather than a single national figure?

Bredeweg: We could get national, and even regional data. The more you push the final breakdown, the less reliable you have to conclude the information is. You can make estimates, certainly, but I like an estimate that I believe, that is probably the best figure available.

Silverman: May I distinguish the two questions--the one of cooperation from the one of better reporting? With regard to cooperation, if we limited our interest so that the finest geographic detail was the state, are we likely to get cooperation?

Kraushaar: It doesn't even fit perfectly into states.

Bredeweg: There are about six or seven places, but they don't hurt you too bad statistically. I would have to know what you wanted to know.

Silverman: Well, suppose it's the same financial data that appear on the form now.

Bredeweg: We could probably get a pretty good estimate on Catholic schools in the United States. Elementary is no problem--the way we did it this time anyway, but secondary gets trickier, because there's only 1,600 Catholic secondary schools. We used 200 of them nationally, because we wanted a geographic spread; but our view was regional, and we wanted the two types--the parish or diocesan and the private schools. These 200 schools were all whose figures we trusted, whom we could get to cooperate further, and yet they give statistical spread geographically and type-wise. Those 200 might not fit the states very well, though; so on the secondary level you have additional problems.

Goldstein: If you're asking, Do we have a state organization that could get the data?...I would have to say, Yes, on some occasions; but we would still go with the diocese, and then we would gather those from the state. There are some that cross state lines, but not any appreciable number.

Porter: Is it also hard to get just tuition data? I get quite a lot of calls that people are interested in the universe of Catholic schools, and they do need the tuition information.

Goldstein: Well, I'd be interested to know what actually came out of the '77-78 survey, in terms of tuition information.

Lamborn: Excuse me. Do you mean total amount of money or the tuition level?

Goldstein: Fees, primarily.

Lamborn: We never asked that. We did not ask what does it cost, what are your tuition fees?

Goldstein: Oh, I see what you mean. We do have that in the two surveys that Frank did. We have estimates of tuition, and that is for secondary schools, broken down by private diocesan and parish schools.

Nehrt: Did you ever feel that there was a problem in including a question which has to do with fee?

Bredeweg: Well, it isn't a problem to NCEA right now, but in a broader spectrum of other issues it might be. Why set up something that you can't count on in years to come if you want to plan on an approach? What do you need this for anyway? Why do you need state-by-state or diocese figures? Why aren't national or regional figures, that are reliable, a better answer? I can give you better national/regional figures than those questions answer.

Lamborn: This is a different question now, Frank. It's merely asking a simple question, "Can you tell us what it costs to have a child attend the first grade, the second grade, the third grade, fourth grade? What tuition fee do they have to pay?"

Bredeweg: We can tell you tuition ranges, if they all answer this year's diocesan summary--how many are in this $50 range and that $50 range, up to about a $1,000. Then we have historical information in the analysis.

Nehrt: Tuition, to me, is one of the critical data elements in this tuition tax credit debate. Really, it doesn't interest the Congress to know how many kids are going to private schools, nor how much is being taken in, nor how much is being spent. If it's a matter of deciding whether we will give a $200 rebate or a $500 rebate, what kinds of tuitions parents are paying, I think, is really the critical issue on tuition. If they're going to set a $500 rebate and everybody is paying $3,000, that's one situation. If they're going to set a $1,000 rebate and nobody's paying more than $500, it's a different kind of a problem.

Silverman: It leads to a funny predicament for federal analysts who, since they can't get the data from the school systems or associations, are going to the household survey and asking the question through a household survey. We're a little unclear about what we get through a household survey. The Census Bureau interviewer goes out and fills out forms, but my fantasy is that critics look at the figures that the Census Bureau gives us and say, "No, it doesn't check with our records at all." That's the kind of situation it ends up in.

Goldstein: For the Catholic schools, too, not everyone pays the same tuition. For example, the first child in the family costs more, and there are other variables all down the line.

Kraushaar: Many types of schools don't fund their scholarship programs, but they simply don't collect the fee from certain people, even though they have an announced tuition charge. There's also the differential in tuition if two or three children are in the same school. You pay different amounts for second and third children.

Goldstein: There is no secret about it. It's just that the federal government is asking the question.

Bredeweg: They worry about who is going to match up this with that.

Silverman: One way around this, if we could demonstrate for ourselves that there is not a federal interest in each individual school, would be to not ask the same schools to provide all of the information. Ask some of the schools for the ethnic composition, a different sample of schools for the financial information, a third sample of schools about the enrollment; and each one is a subsample of the total. But in no case would be have all the information on a particular school. Is that one way that would deal with at least part of the sensitivity?

Goldstein: I think you would get no cooperation on the ethnic question, right now. I think that, while all the Catholic schools are proud of their performance in that area, they are very sensitive to the IRS problems that they are having now, where they have to prove their nonprofit status, under the presumption that they're guilty unless proven innocent. That would be an extremely sensitive question at this time.

Bredeweg: Nor would you ever be able to get as reliable financial information on Catholic schools via that questionnaire as we do, by the methods that we have used. There's no way you could design that question and get as much information as we have gotten by taking further steps.

Lamborn: It seems to be that the question of getting financial figures out of the private-school community is enough of a question to suggest sitting down in a smaller group, when there aren't other things to talk about, and try to work them through. It's fine to go as far as you want to go here, but it is clearly complicated, and it's complicated in a number of different ways, depending on which subset of private schools you talk to.

Eldridge: It is surprisingly complicated, and I think that's why the discussion continues. It is difficult for anyone to come up with a consensus as to why it's difficult. Now, one is reminded of twenty years ago when collecting racial data was a "no-no" and then suddenly it dawned on the minorities that without the data they couldn't do anything. Then, they became the staunchest defenders of collecting those specific breaks.

McLaughlin: Could I answer a question that you raised a little while ago: Why does the federal government need to have financial data on individual schools? In fact, there is one valid reason that I know of, from the point of view of data analysis, and that is to calculate correlations with other variables to feed into formulating policy. For instance, there's the question of "Are rising tuitions related to declining enrollment?" What you need to address that question are the correlations for individual schools, and for correlations, you need enrollment-decline and tuition-rise data on individual schools.

Silverman: I'd like to ask Marty to respond to that. Is that one of the items on the long-range agenda that you were talking about this morning?

Jacobs: Yes, I think it is. I mean that's the kind of thing that we're interested in looking at. I don't know if we'll be able to do it through the current survey. Well, obviously, we won't be able to do it, because we won't have tuition on the form; but in predicting responses, you're right. There are a lot of questions that lend themselves to that kind of analysis.

McLaughlin: So, in fact, one solution might be, if you can't supply individual data, for NCES to buy the correlations. If, in fact, you can produce the correlations based on individual schools with all of the other variables that are around, then that might be sufficient.

Bredeweg: We could not do that in the present project. I don't know what we could do in future projects. This is, of course, a research aspect; and research can vary in many different directions, but on enrollment and tuition...

McLaughlin: But we need to question whether there is correlation among those variables. Does raising tuitions, in fact, cause decreased enrollment? One source that I read on this said that there evidently is not much of a relationship between increase of tuition and declining enrollment. That's something that a survey like this could really test out and record changes in from year to year.

Bredeweg: I can appreciate the many aspects you'd be interested in from a research perspective, but you could never program something like this. I mean if we ask the superintendent that question, he has an answer. The effect is nowhere near as much as people claim. Tuition doesn't affect enrollment nearly as much as other factors. The researcher wants that computed, but we just can't structure this; it's just not sophisticated enough.

McLaughlin: I was just trying to answer, in one way, the question of why the federal government needs individual school data.

Bredeweg: Your point is very well taken, but in the overall picture, no, they couldn't answer. Maybe that's the place to start. You could not ask our schools the question and get an answer. There's no possible way that they can answer that. Often their recordkeeping doesn't give them those kind of figures, and it's a lot better now than it was ten years ago.

Eldridge: What do you mean, Their recordkeeping doesn't permit them?

Bredeweg: Well, they can't give you a financial statement. For example, there are many elementary schools, that we are interested in, that may not even have a set of books.

Silverman: Can we speculate for a few minutes on this point? It seems to be fundamental for the future of any kind of statistical program on private schools. I wonder, for example, if we can use the Neilson Television Household

as one analogy? What would the chances be of designating for some given year, like 1979-80, a national, relatively modest-sized sample of your schools as the "households" whose television sets are monitors by "Neilson"? In this case, through the use of some kind of federal-financial assistance, record systems would be set up to federal specifications. Every school isn't required to do it; but let's say 200, if that is considered to be sufficient to get national estimates. You would monitor the quality of the recording to agreed on specifications, and then supply us with specified tabulations or correlations without ever giving us the raw data so we don't know the results for particular schools. That's one kind of fantasy.

Bredeweg: We have just done it, so that's just a standard operation now. We used 200 schools, and we have composites by groups and types. That is, in my opinion, the best information available on financial information on Catholic secondary schools right now; and I would argue that those are true figures.

Silverman: That's one of the purposes of this discussion, to discover operations and alternatives that are mutually beneficial.

Goldstein: In other words, you would like to have our survey reach 200 returns of financial information without identifying the schools?

Silverman: That's one possibility, right.

Lamborn: Excuse me, but if you're going to attempt to get some idea of what the financial condition of the American private schools is, you have to come up with another sample which is stratified to take care of all the non-Catholic schools.

Silverman: Yes. We would have to think through all our analytic needs prior to the fact and design not only the analysis but also the sample of schools that would be required and, indeed, all the requirements that would have to be met.

Lamborn: My guess is that aside from the Christian school movement at large, that we could do pretty well with the remaining elements of non-Catholic private education.

Silverman: One of the key elements, aside from anonymity, necessary to allow all federal types to do the various studies that are needed is the installation of a standard recordkeeping system, presumably for which we could share in the expense. It wouldn't be merely putting the numbers down, but saying, "We'd like you to keep records in a standardized way"; that "You are now part of this 'Neilson' family."

Bredeweg: That makes it much more complicated.

Silverman: You would have to monitor the standards, to see whether they're being followed.

Eldridge: It seems to me that short of NCES having the authority to ensure confidentiality, even though we can encode the identifier, there will always be the possibility that the data can be identified by someone who really wants to pursue it. If we could get (and I'm not saying we can get it, because it's very difficult to get), legislation which would grant us the authority necessary to guarantee that the data could not be subpeonaed, then presumably, am I correct, the problem would go away?

Bredeweg: Well, in this particular project you could get the pressure off, I think.

Eldridge: Now I'm not suggesting we can do this. The necessary authority is next to the impossible kind to get.

Goldstein: If CAPE and NCEA were the collecting agents, then we could not obtain the contract money to do it if we were not agreeable to making the collection open to the public. In other words, we could do it, and it would not then be available, except what we would report.

Nehrt: Marie, are you saying that, if everything fit together the right way, we could conceivably negotiate contracts with CAPE and NCEA to produce additional school records without the school names or addresses, just some geographic location identifier? In other words, that they could collect the

data, edit the data, maintain the control logs, and submit individual school records to us without school name or other identifiers--is that possible?

Eldridge: Now I think that is possible, but I was also saying that even if we were to do that, I could still envision the situation where an individual school still could be identified by the virtue of its uniqueness. For example, there is the case of just one school or one denomination in a city. Then what do you do? You have to merge, and then you begin to get a little messy.

Nehrt: The likelihood of only one school in one city in a particular group seems rather unlikely.

Eldridge: I'm not so sure, in a non-Catholic denomination.

Silverman: I assume for this purpose we give up city; we'd give up geographic identification for this purpose.

Eldridge: What I basically was asking was what would result if we could get legislative authority such that the data were absolutely confidential and we were under no pressure, whatsoever, from any source to supply those data, such as the National Traffic Safety Board has in their accident investigation. That authority permits them to go in and do an absolutely thorough investigation, so that they get as close to the facts as they possibly can. In a sense, that's what we're trying to get here. The problem is very similar--it's the confidentiality of the data. Now, I'm not suggesting that even the Department would seriously consider proposing this legislation for NCES. I only pose that as the extreme case. My question was, if we were able to accomplish that, would the problem go away? That was my question.

Nehrt: There is ample precedent for that, provided that you can furnish the justification. LEAA has that kind of a deal. They can do all kinds of surveys of almost any kinds of institutions to find out incidences of crime, victimization rates, and so on; and they are not permitted, even under court subpeona, to disclose any of the information they have collected associated with a specific respondent. FBI has that with the uniform crime report. It's a difficult thing to get.

Elridge: Yes, but all the cases we're citing are legal issues.

Goldstein: Well, I'm not sure we can answer that. We can't say "OK, that after we get the assurance, then we absolutely can provide the data." It's not up to us to say. Certainly we would need some inputs from the diocesan superintendents.

Silverman: It isn't a solution, anyway, to our short-run problem of having data by 1981.

Eldridge: I was just trying to see if you would say at this point, "No, even that wouldn't solve the problem."

Goldstein: I'm not going to say "No" either; I'm not trying to say that we probably would, but it is not up to us.

Silverman: This is an interesting and different version of what Roy was suggesting this morning: that the federal government get one coordinated activity to meet all these data needs. This would be a way of meeting all our analytical needs without being involved as heavily as Joanell and Roy are now in actually collecting, compiling, and tabulating the data.

Bredeweg: It isn't that Catholic schools are trying to be secretive. Now they're just worried that it will come back to hurt them in some other way. I would be afraid that if you built on that you would be disappointed later. I would like to see a long-range plan that you knew you could implement year after year.

Silverman: Are you inviting us to do this?

Bredeweg: Well, I think we should wait for Rhoda's report.

Goldstein: I think I've almost already given it.

CAPE's Role in Nonpublic School Data Collection (Robert Lamborn, the Council for American Private Education)

I have found, as the morning and afternoon have worn on, my comments have modified so fast that I haven't been able to keep up with them. Therefore, I suspect that I'll say some things I'll wish I hadn't; but I plan to anyhow, so you'll have to put up with them. I'm delighted that this seminar is here. Those of us who have been around awhile, thinking about private school statistics (and I'm not the one who's been around the longest by any stretch of the imagination), could hardly have imagined that this much time would have been put in by people with this much power on the side of the Administration to consideration of this problem. It's been suggested that this is the first in a series of conversations; and I think it's evident that that is what it, in fact, needs to be. There are a lot of problems in here that need to be worked out. One of them, I think, is the general problem of helping to explain to private-school people what the intent of the government is, what your attitudes are, how cooperative and friendly, or vice-versa, you are with regard to them; and, by the same token, trying to explain to people who are not intimately familiar with the variety in American private schools what some of the sensitivities are, whether or not they make sense to you, because you have to deal with these sensitivities, perhaps more than with the logic behind the sensitivities.

What I'd like to do, very briefly, is to take a quick look at some of the historical things involved, then I'll talk rather specifically about what I think you could do rather quickly; and then I'll take a more global view of gathering, coordinating, and analyzing data with regard to the private schools. We are obviously committed to the belief that private schools are an important part of the American educational scene, that private schools need to survive as strong institutions alongside strong public schools, that public policy is needed to make that survival possible, and that public policy can only be built on a strong data base such as we are now talking about bringing into existence. The evidence of the strength of this concern over a long period of years has been the fact that private schools found the funds and then talked Dr. Kraushaar into undertaking the base study on the history of American private schools in

American society, that they grasped the opportunity quickly to participate as members of the President's Commission on School Finance back at the turn of the decade, and that they have for years, at least 20 to my knowledge, worked with USOE and NCES to get the federal government to undertake studies of basic data with regard to private schools. Having been in on that for those 20 years, I can assure you that when the decision was made by Ms. Eldridge, NCES, and others to undertake the kind of systematic study which has been undertaken, we were eager to be involved and to do everything which we could to be useful in that effort.

It seems to me that after three years we've made some pretty substantial progress, and that we'll need to build on that progress in the future to answer the kinds of questions that have been raised around the table today. Perhaps it would be worthwhile to comment very briefly on where we do stand. We've been able to identify perhaps fifty different kinds of private schools--ones that have a character that sets them aside from other kinds of private schools. These may be church relationship, pedagogical base, age-level that they serve; but they are groups nationally that are clearly separate from each other. About 25 of those groups have national organizations, and about 15 of them are in the Council for American Private Education. As far as the trends are concerned, you have interior trends within private education that need to be recognized, as well as the overall trends. It doesn't do, for example, to lump data from all the private schools together and assume that represents what is happening to private education at large. In fact, it <u>is</u> what's happening "at large," but the subsets are moving in different directions in terms of opening and closing schools, increasing and reducing enrollments; and they are different in rather vital ways in matters of finance, and structure, and operation. In all these areas, as you look for trends, you can't understand them taken in the whole, unless, at the same time, you take some look at the interior developments, by subsets.

I think the matter of the universe list is worth talking about. It has evolved from studies that were made in the mid-60s and in 1970. Over the last four years, it has been refined to the point where we now have some 20,100 schools that were clearly in existence during the last school year. This is certainly not a total list, but at least in that list there are very

few schools, if any, that exist in name only. The matter of eliminating the preschool, which came up this morning, was a clear administrative decision. It was difficult enough to locate the schools which existed that had first grades and up, much less trying to take on "Little Knickers Nursery School" and the rest of those. Obviously, however, this is an area of major concern to private schools; since the private schools, as distinguished from public schools, are, in fact, the leaders of the preschool movement and have a very much larger role and stake in the preschool movement than do the public schools.

Looking beyond the present practice, which is substantially better than anything we've done before, I'd like to suggest a handful of specific steps which seem entirely practical and fairly close at hand. First, I'd like to urge that we press to identify private schools by the local education agency (LEA). It ties in very significantly to many of the federal programs, and there's no way to deal with these schools in a systematic basis or to respond to the requests of interested and cooperative local education agencies, unless we're able to do it this way. The private school, by the way, will in most cases not be able to identify the LEA in which they exist. They have no reason to know that, and they'll need considerable help.

Second, we ought to press to identify all schools by congressional district. Whether this should or shouldn't have anything to do with public policy, it clearly does, and a request, which we have regularly from people on the Hill, is for a list of the schools within the districts.

Third, we ought to press to obtain routinely, and on the same basis as the public schools, data on new or continuing federal program participation. We ought to get it by schools, by the numbers of eligible students, by the numbers of participating students, by the extent of participation, by dollars expended in areas of research and innovative grants as well as in areas of service to children, by teachers and professional training programs, and so on. I realize that this is a new era and that all will be different now that we have passed this new legislation, but I am reminded of three examples of past practice. First, there was a comment within the last two months at a meeting of a group of Chief State School Officers and people from NIE, having to do with the survey,

where a Chief said that he had absolutely no responsibility to obtain any information with regard to participation of any private school student in any federal program; and if in fact that information was to be obtained, it had to be obtained on the initiative and through the work solely of the private school people. A second one was an earlier RFP for a study on disadvantaged children, which specifically excluded a consideration of the impact on private school children. And there is the regular practice, until fairly recently, of disregarding the evidence of noninvolvement of private school people, where they should have been involved in monitoring activities and in the provisions for grants.

Fourth, we ought to press to get information on the participation of private-school children in state programs, so we can delve into the interrelationship between federal and state programs. We've already discussed the information on tuition fees, and I think we should press as hard as we can to find a way which will meet the dual needs of privacy and concern for misuse, on one hand, and the obvious need to get that kind of information so that reasonable public policy decisions can be made, on the other hand.

Fifth, we need to get information with regard to race, however sensitive it may be; and if it can't be done from the schools, then I think the kinds of things that have already been proposed about getting it through Census should be pursued. I think it would be extremely interesting to find out, for example, to what extent the "white flight" to the private schools is paralleled by "black flight" to the private schools. Clearly, it exists, and clearly, we ought to know about it.

Sixth, I guess we ought to get information related to socioeconomic background; and it seems to me that would be entirely possible (again working through Census, as necessary).

Seventh, we ought to get information with regard to private-school enrollments in metropolitan areas, in states, and by regions. In other words, the breakdown, particularly in the great-city schools, state-level, and regional-level, would be extremely useful in interpreting the role of private schools in American education and in American society. Numbers enrolled--

the percentage they constitute of the total student population--we need to know and think about these in a systematic way in order to understand the inter-relationships of public and private schools in serving the total population. Critical for that is a breakdown of the data by the major urban centers, where there is a heavy concentration of disadvantaged.

Eighth, we ought to study the current and continuing practices and the treatment of data for public schools and establish parallel and integrated patterns of treatment for private-school data, wherever this is practical in terms of the nature of the data. We ought to mainstream private-school data. If we do that, we'll begin to know something about the public/private-school roles and we'll begin to be able to create some informed public policy about those roles.

Ninth, it seems to me we should avoid consolidating subgroups of private schools across Catholic/Protestant/Hebrew lines. In the last advance report, for example, Catholics and Lutherans were put together, and the rest of the Protestant groups were left outside in some other kind of group. I just don't think that's a very good way to deal with the information.

Tenth, it seems to me you ought to work out a systematic consistent rationale for establishing totals based on actual responses. We ought to be very careful about issuing reports without factoring these estimations in. I realize that in the advance report, it is clearly stated that this is partial, but it seems to me that the public has difficulty in dealing with that concept. They accept the figures as total, even though they're announced to be partial. It would seem to me that some major effort should be made to impute missing data for the advance report.

So much for a general background. We also had the broader assignment today of dealing with statistics that relate to the final questions as to determining the role of private schools in American education and society. These questions can be answered best by coordinated selection and analysis of relevant information and by providing easy access to that information for analysis. Let me spin off a plan which I feel is implied by the sorts of things you were talking about earlier on and by other things that have been said around the table. We need to deal with a series of major groups. We

need to deal with Census and its capacity to create demographic information, with NCES and descriptive information. Then we need to deal in a coordinated way, it seems to me, with NIE and the research capabilities within the private school community. Recently, there have been created the Center for Research in Private Education, at the University of San Francisco, and a Special Interest Group within the American Educational Research Association called Associates for Research in Private Education. There's been a conference to lay out a research agenda dealing with private schools under sponsorship of NIE. This research community needs to be tied into a consistent pattern of data collection with regard to private schools. Finally, there is a necessity to make a concerted effort, already begun with ERIC and the Libary of Congress, to create national repositories for information related to private schools.

Let me say that if all that sounds optimistic, in fact every one of those steps has at least been initiated within the last three or four years, and there was even a meeting about a year and a half ago that brought together representatives of all of those groups to talk about the coordinated data gathering, control, display, and retrieval system. This occurred when there were not nearly the pressures or the impetus that are supporting this present meeting.

In summary, we've come a long way. We have a lot better base to start from; we have the capability very quickly of improving that base; and if, by any chance, we can do what people say normally can't be done, and that is bring together the various sub-elements which could contribute to the creation and utilization of these data in a systematic way, and we will have done something pretty exciting.

NCEA's Role in Nonpublic School Data Collection (Rhoda Goldstein, and Frank Bredeweg, National Catholic Education Association)

Editor's Note: The presentations by Rhoda Goldstein and Frank Bredeweg were inadequately tape-recorded. In lieu of a transcript, we are including a paper by Frank Bredeweg, developed as an NCEA consultant, expressing "Comments and Reactions on NCES-NCEA Statistical Projects." The content of this paper closely parallels the actual presentation of the NCEA representatives.

Introduction. These comments and reactions are in response to a request by the National Catholic Educational Association for an opinion regarding past and current developments in the area of cooperative statistical projects between NCEA and the National Center for Education Statistics (HEW). Since the 1978-79 joint data-gathering project marks the third and final year of the efforts presently planned, review and evaluation are in order. The context for this report should be that it was prepared to produce initial insights and attitudes, and that related policy suggestions are, of course, subject to the many other factors affecting the organizations involved.

Need for nonpublic school statistics. It is important to state at the outset that statistical information about nonpublic schools is unquestionably necessary. Public education, the nonpublic constituency, federal and state governments, research studies, congressional staffs, government bureaus--these and other agencies are vitally interested in this sector. Nonpublic schools continue to service about 10% of the nation's elementary and secondary school pupils, and are of particular significance in many areas of special concern--e.g., large urban areas. Because of the national scope of these institutions and the need for statistical comparability, the responsibility for this data collection falls to the appropriate government agency; i.e., NCES.

Existentially, almost a century historically attests to this need for nonpublic statistics. The Office of Education began to gather them as far back as 1889-90. The five-year NCES reports which continued into the 60s, the gigantic NCEA-NCES cooperative effort of 1970, the current 3-year project,

all witness to this innate need. Should no plans be set now for the years to come, something would undoubtedly occur in the not too distant future to bring about unplanned arrangements.

Current accomplishments. Much has been accomplished by the efforts of the past and present. General data bases will be available through the 1978-79 school year. Data-gathering mechanisms and methods have been established. National and local personnel have become attuned to this particular data inquiry, rather than numerous other questionnaires sitting on their desks.

In addition, information about certain specialized areas is now available--e.g., the number and identity of nonpublic schools having any degree of participation in federal assistance programs, the types of academic programs offered, a more extensive classification of schools by population center and by type, and an important thrust into the arena of financial information. The three consecutive years of data which will be available after the 1978-79 project should be a solid base for future direction and refinement.

Current weaknesses. The same quantity of information gathered during these years, which could be such a valuable data base for the future, seems also to have contributed to the major weakness of the present approach--i.e., the information cannot be processed quickly enough. As things are going, it will take many years to prepare and syncretize the statistics from the 1976-77, 1977-78, and 1978-79 projects. The only publication to date, Nonpublic School Statistics, 1976-77...Advance Report, was published more than a year after the data gathering was completed. None of the (11) tables originally requested from NCES have been turned over to NCEA. It does not appear that NCES can digest this information within a practical time-framework. This is not an indictment of NCES, which has many important priorities to observe. It is, however, a recognition of a deficiency which might be correctible--e.g., place more responsibility in the hands of NCEA and CAPE.

Placing more of the project into the hands of the performing agent might alleviate other inefficiencies and breakdowns which have weakened the project. For example, changes were made in the 1978-79 survey form; i.e., no date, no instruction to return to the Diocese, a less-than-professional two-sheet foldover form which caused mailing and editing problems. These changes would not have been approved by NCEA, which should have been, but was not, asked. Other examples are the contracting and printing breakdowns which have delayed the promised "early August" delivery of the survey forms to the diocesan offices, and the late (October 23) delivery of the edit labels. It is readily acknowledged that government agencies must respect numerous internal regulations and priorities; but responsibility for detailed statistical projects, such as the ones being discussed, would be better placed in the hands of the performing agent, wherever possible.

Another weakness in the present effort is that it does not relate to any future plan. In addition to the advantages which even a short-term plan offers to administrative efficiency and selective scheduling, it is becoming pivotal to NCEA that its present data-gathering efforts be coordinated; i.e., the NCES project, the annual diocesan DataBank, the CIC project, financial studies, minorities studies, and whatever else might come forth. As important as NCES cooperative efforts are, NCEA would have to opt for its established cycles should insoluble conflicts arise between NCEA and NCES objectives.

Recommendations. Four suggestions emerge from these comments. As previously mentioned, they must be tempered by the factors affecting the agencies involved.

First, a long-range plan (say 6-10 years) should be adopted by NCES, NCEA, and CAPE. Present uncertainties are very costly. More importantly, this uncertainty may affect the cooperation of the respondents, which has been remarkably good so far. As mentioned, NCEA must also coordinate its future data efforts.

Secondly, a two-year cycle seems to be the most appropriate, considering the present overload and that much of the information now being gathered need

not be gathered every year. For example, on a ten-year plan, future projects would be in 1980, 1982, 1984, 1986, 1988.

Thirdly, now that a data base has been established in many special areas, it seems that data demands can be reduced and a simplified "standard survey instrument" developed. The basic questionnaire would be simple and repeated each year. Computer programs could be used for the term of the questionnaire. For example, NCEA could meet its basic data needs with about five elements: the header, population and program types, enrollment by grade, religious and lay professional staff, and operating expenses. When and if the need warranted, the basic biennial questionnaire would be accompanied by selected addendums. Restraint should be exercised, but, for example, in 1982 information on federal-program participation might be requested by an accompanying insert.

Finally, the principle of subsidiarity seems to apply. Wherever possible and legal, responsibility should be left in the hands of NCEA, from questionnaire design through data processing. In 1970, the project began with agreement upon the information needed and culminated with a delivered computer tape. There are many variables, of course, but there do seem to be times when things are more easily done by NCEA and CAPE.

Conclusion. These reactions and comments are intended to assist NCEA in its evaluation of present cooperative efforts with NCES, as they relate to mutual objectives and other NCEA statistical projects. This evaluation should be completed prior to the spring NCEA convention, so that the 1979-80 program can be outlined for the diocesan superintendents.

Remarks on Meaning and Significance for Private Schools (Otto F. Kraushaar)

Unlike most of you assembled around this table, I do not represent any sort of institution or agency, public or private, so that my remarks can be ignored with complete impunity. Moreover, after reading Don McLaughlin's instructions regarding the intent of this seminar, I made the mistake of writing down the remarks I wanted to make. That was in the cool and quiet of my study. Now after listening to the comments of all the other seminar participants, I find that most of the points I planned to raise are either false, irrelevant, or repetitive. That is one of the perils of speaking near the end of the program.

What follows is therefore a pastiche of comments about some of the issues raised earlier in the seminar and some thoughts on the nature, aims, policies, and practices of private schools and how they relate to the world of the public schools.

Private schools, despite the fact that they educate only about 10% of youngsters of school age, are valued because of the special contribution they make to the whole of American education and because they are looked to more and more as potential models that can tell us something important about the process of education. I realize that our task here is not to discuss or advocate school reform but to consider how the process of gathering and disseminating statistical information about the schools can be most helpful to schools of all types, to federal and state governments, and to the interested public. The key words of this seminar are "meaning and significance." With that stress I sympathize. Too often we react to costly surveys about how many pupils attend schools of this or that type with feelings of "so what." The bare statistics give us precious little insight into the process of education or whether it is moving forward, sideways, or backwards.

I shall have little to say about the survey instrument or specific revisions of it. I assume that it can be made to gather information of a more sophisticated, subtle, and useful kind only by becoming larger and more expensive, and at the risk of becoming so formidable as to trigger the law of diminishing returns. The private schools are a strange breed. A

"school" can be anything from a parent tutoring his own children and perhaps taking in a couple of the neighbor's kids to a large, well-established and socially responsible center of instruction. That is why you have so much trouble getting responses from that mysterious remnant of 18% or so of the silent institutions that are out there somewhere.

My interest in private schools stems from the belief that the dual system of public and private schools and colleges is one of the major sources of strength in the educational system. The private sector teems with diversity in the form of religiously affiliated and unaffiliated, coeducational and single-sex schools, boarding and day schools, schools for the talented and for slower learners, academic and vocational schools, schools specializing in military training, music, fine arts, athletics, the handicapped, and so on; and, alas, it also includes schools designed to avoid racial integration. The proper and best form of education for each individual human being is a subject that we still know dangerously little about, even after a half century of intensive research into the process of schooling. As long as human beings come in different sexes, with varied talents and aptitudes, from various income levels and social classes, with all kinds of racial, ethnic, and religious backgrounds, and with everything from careful home nurture to outrageous child neglect and child abuse, it is quite unlikely that only one type of institution will be best for everyone. The greater the diversity of institutions people have to choose from, the greater the likelihood of finding a good and beneficial fit.

Until quite recently, many public school educators and government officials either ignored the private schools or were downright hostile to them. And it must be said, that up to quite recent times, many private schools were quite content to be ignored by the general public. Some with long memories can recall a time when they were not only not ignored but found their very existence threatened by super-patriots who believed that attendance at other than public schools was unAmerican. One of the neglected chapters in the history of American schooling is the relationship, or lack of it, of public and private schools, and the authority of the state as over against the rights and persuasions of parents in the education of children. That running conflict was finally laid to rest, constitutionally at least, by Peirce v. Society of Sisters, the 1925 land-mark decision of the Supreme

Court involving a Catholic parochial and a military school in Oregon. The Court not only affirmed the right of private schools to exist but the right of parents, above the state's, to choose the kind of education they deem best for their children. The decision also affirmed the responsibility of the state to supervise private schools.

From the time of Peirce until quite recently, public and private schools existed side by side in the state of an uneasy truce. But two recent developments are provoking a reassessment of their respective roles and relationship. The growing discontent of the American public over what it sees as the deterioration and excessive cost of public education, in large urban centers especially, is spurring the search for alternatives. As a result, many parents are taking a fresh look at the private schools that might be available to them. On the other hand, the private schools who in the past nursed their privacy, perhaps too intently, have come out into the open, are now organized nationally under CAPE, airing their problems, keeping an eye on federal and state legislation affecting education, and asking probing, agressive questions regarding public policy towards private schools.

What now are the areas and problems of private schooling where the lack of up-to-date information is most serious? With your indulgence, I shall follow the pattern developed in the published study--American Nonpublic Schools: Patterns of Diversity. The data for the analyses contained in the section entitled "The World of the Private Schools" were gathered by means of six survey instruments, one each for general school statistics, the school head, faculty, students, parents, and governing board members. The data so gathered were supplemented by some 60 school visits by pairs of visitors and with the aid of carry-in questionnaires. That section is easily the best documented of any in the book but proved to be the most controversial. I have since come to see that this is the way of research surveys. James S. Coleman was on the advisory board of the study, but that fact only made our critics the more ardent. The criticisms were directed not so much at our results as at the methodology. Nevertheless, since it was the first and still remains the only study of its kind, the results are widely accepted as authentic, although they are now somewhat out-of-date, since the data-gathering was done in 1968-69.

What we tried to do, first of all, by means of a general questionnaire, besides gathering the usual school data, was to characterize the patrons of private schools. What is their cultural, educational, and socio-economic background and their political orientation, why did they choose a private school, and what degree of satisfaction do they find in the outcome? We also queried the school head, the faculty, and the trustees regarding these matters. The interpretation of the results became very complicated by virtue of the great diversity of types of schools involved, which were stratified in our samples on the basis of religious affiliation or lack of it. The samples consisted of a large general sample, a substantial in-depth sample, and a small leading schools sample.

Next, we undertook to examine three constituent groups--students, teachers, and the school head--in greater depth. The students were queried at length regarding their life-goals and moral ideals, what they want of the school, what they think of the school environment and the way stress, grievances, and related concerns such as discipline, the study-load, homework requirements, pressure for grades, and the college admissions rigmarole are handled. Since the study was in progress during the height of the student rebellion of the late sixties, we also covered such topics as student militancy, drugs, and drinking.

Regarding the teachers, we undertook to draw profiles of the faculties of the different sorts of affiliated schools in contrast with those serving independent schools. The differences are striking. We found that the independents tend to prefer Ivy League graduates who are chosen as much for their personal characteristics as for their intellectual accomplishments; they seek out the personable, intelligent amateur, whether certified or not. Their counterparts in the church schools are drawn mainly from the appropriate sectarian college, many of them are members of a religious teaching order, or in denominations where these do not exist, they tend to think of teaching as a "calling," a special kind of ministry. The net effect is that private-school patrons believe that those who teach there are more "dedicated" than their better-paid, unionized, and tenured colleagues in the public schools.

We tried to draw out private-school teachers on why they chose the kind of school they did, how they rate their own effectiveness as teachers, the problems they face as nonpublic school teachers, what they think of the proffered salaries and the lack of tenure, and what role the schools play in the advancement and continuing education of the teacher corps.

The queries regarding the head or principal--directed to faculty and trustees as well as to the head--covered the style of leadership, the religious and social orientation of the head, the qualities most valued by his or her associates, the head as administrator and as leader, the standards by which his or her performance should be measured, and the ideal length of tenure in office. The leadership role of the trustees and their relations with the head were also probed.

By their own admission, the crucial problem facing most private schools today is making ends meet financially. The nub of the problem is that costs and income are both rising; but costs, thanks to the rampant inflation, are rising at a steady rate, while income is rising at a declining rate. Coming to grips with the current financial condition of all types of private schools is difficult, as you well know, because they do not employ a uniform standardized accounting system. Catholic schools, in particular, are lax in this respect.

In the survey I have been describing, we undertook, as best we could, to obtain information regarding all sources of income: tuition, federal assistance under titles of the ESEA, various forms of state aid, campaigns for annual and capital funds, endowment, church donations and diocesan loans, gifts, grants, deferred giving, bazaars, dinners, rental of school facilities, profits from certain campus operations, etc. We also undertook to explore any indebtedness which the schools had accumulated either because of operating deficits or as a result of capital outlays not covered by gifts. Some of our findings document the true gravity of the situation. As of 1969, for 331 schools reporting, a third were free of debt, another third reported debts of moderate dimensions (less than $50,000), while the remaining third carried debts in excess of $100,000. Many in the latter group are small schools for whom a debt of that

magnitude is a grave impairment. When one considers that these figures do not include indebtedness carried by congregations for the schools or unpaid diocesan loans, and that, moreover, the financial prospect of many schools has deteriorated since 1969, there is little solace to be found in this picture.

We made a special effort to find out and set forth, as clearly as possible, what private schools are doing about the racial question. The picture is a mixed one, made so by the fact that the commitment to nondiscrimination of some of the affiliated and unaffiliated schools goes back to early Christian-missionary activities and the liberal outlook of certain founders of long-established independent schools, while, on the other hand, it is a well-publicized fact that private schools are used in certain regions to evade integration. Generally speaking, the Quakers and, more recently, the independent and Catholic schools, as well as some Protestant schools, have become significant positive influences in furthering school integration.

One recent development deserves to be viewed with concern. In the late sixties, Catholic inner-city schools, oftimes inhabiting buildings deserted by the white flight to the suburbs, were increasingly enrolling non-Catholic Blacks, Chicanos, Puerto Ricans and other Spanish-speaking children from poor families. A recent study estimates that, in New York City, one of every three students from low-income families is attending a private school. About 90% of them are in Catholic schools. Many of these schools are so demonstrably superior to their counterpart public schools, poor parents are willing to pay tuition, often in weekly amounts, because they want their children to have the best education available.

These schools are now increasingly threatened with financial insolvency. What happened is that the dioceses concerned, finding that they could not pass on the full and rising cost of an elementary school education to their impoverished patrons, began subsidizing them by diocesan loans and grants, which meant that operating deficits were being covered by the expenditure of capital reserves--a sure recipe for bankruptcy.

Obviously, this could not go on indefinitely, and in the last few years, the facts of life have been coming home to roost in one city after another, with Philadephia, Chicago, and Boston the prize exhibits. If the trend is not arrested--and short of some form of public aid it is not likely to be--these schools will largely disappear in another decade. Catholic educators are truly perplexed. They see in these schools an opportunity for the Church to serve a vital, humane public purpose. But their older and affluent parishioners, having escaped to the suburbs, are now less interested in Catholic schools than they were in their earlier years of poverty and struggling.

In closing, I would like to offer some thoughts on what may be called the public utility of private schools. Until very recently, little attention was paid to the general public benefits that the operation of private schools confers. The private schools themselves were well aware that they had a consitutional right to exist and were satisfied that they were serving their own constituency. Many public educators regarded the presence of private schools as an unmitigated evil, because they deprived the public schools of some of the best talent. They see them, still, as mainly white and elite despite the fact that in many cities a substantial part of the poor student population is now being educated in private schools. Here and there a voice was raised to remind the public that the work of the private schools saves the American taxpayer billions of dollars annually. But few people are aware of certain other positive benefits that flow to communities from the presence of private schools.

The growing concern and intense interest in state and federal aid has brought into the open additional arguments concerning the public interests these schools serve. Private schools not only serve as alternatives to public schools; they resist the further outflow of upper-middle and upper-class affluent whites to the suburbs and in that way prevent the further erosion of the tax base and the deterioration of neighborhoods. The public schools, too, benefit from these developments; because they generate not only more tax funds for the support of public education but tend also to arrest the racial and class segregation of urban areas which results from the organizational pattern of public schools and, in turn, contributes to their problems.

User-Based Analysis (Don McLaughlin, American Institutes for Research)

Overview. A survey report has meaning and significance only in the minds of its readers. Insofar as the report contains information that fits the framework of readers' thinking, it will have meaning. If, moreover, it contains information that affects the planning and actions of readers, it will have significance.

The first consideration in planning for a survey report in order to maximize meaning and significance must, therefore, be to identify the readers to be served. In the case of the nonpublic school survey, the primary audience might be seen as consisting of four groups and their representatives--families planning their children's education, the administration and staff of nonpublic schools, the administration and staff of public schools, and governments.

The second consideration is "what do these audiences, or readers, need to know?" In order to answer this, it is not sufficient merely to ask typical members of the audiences what they need to know. As information experts, you need to help them see what information they need. It is not merely what seems interesting, but rather something that will help them formulate plans and make decisions concerning action alternatives. Therefore, the first step in determining what potential readers need to know is to identify action alternatives they are capable of selecting and implementing. This can be done through interviews, through seminars, and through literature reviews.

It is often claimed that the collection of data on educational programs has little if any effect on educational policy. This is, at least in part, due to failure to consider specific policy alternatives rather than general political goals in designing, analyzing, and reporting surveys and evaluations. For example, reporting that children in Title I (Compensatory Education) classes are not showing gains in achievement as a result of the influx of federal funds has had little effect on government policy, because it does not relate to alternatives among which Congress can choose. Congress cannot legislate that children shall learn! On the other hand, reporting that a large percentage of children in Title VII (Bilingual Education) classes

are dominantly English speakers has clear policy implications--regulations for participation in Title VII can be tightened so that the funds are channeled to those who need help most.

Identifying needs for information. In the case of the nonpublic school survey, I can list a few of the critical decisions on the basis of a modest literature review. This seminar has mentioned or suggested others. For families, the major decision among action alternatives is to send a child to attend a particular school. For nonpublic schools, the major actions are (a) setting tuition levels, (b) setting student selection standards, and (c) selecting curricular goals and methods (in the broad sense). Public schools cannot set tuition levels or student selection standards, but they can select educational curricula. Governments can set laws and regulations and provide funds in order to encourage families and school administrators to take actions that will improve the efficiency and equity of education.

The second step in determining what potential readers need to know is to identify the rationales for the decisions they must make and the arguments that affect the decisions. It is often pointed out that decisions, especially by governments, are made through a complex "political" process and that, therefore, social science data can only play a minimal role in policymaking. That is a non sequitur. Even though the decision process may be extremely complicated, empirical support does add weight to the position of the person who can cite it. Although other arguments may prove more persuasive for a particular decision, the empirical support may either modify it or affect the course of future decisions.

You can identify rationales the same way you identify actions: through literature review, seminars, and interviews, as well as through common sense. In the case of the nonpublic school survey, we can list the primary rationales for the decisions by families, school administrators, and government policymakers.

Information needs for families. For families, the selection of a particular school might be based on (a) costs, (b) location, (c) the school's

curriculum, and (d) the student population of the school. Without specifying how these factors are combined by different families, it follows that the information that they would find useful from a survey would be a directory of schools that specifies costs, locations, curricula, and student characteristics. The Center may or may not want to serve this audience with this survey, but if they do, this would appear to be the way to do it with meaning and significance. I should note that the above factors are based on my own hunches. Interviews with a few dozen representative individuals who have made such decisions prior to the survey design would certainly be called for if such a directory were to be produced.

Information needs for teachers and administrators. For nonpublic schools, there are three major actions to consider, and they interact with each other. First, there is the setting of tuition levels. In setting tuition levels, nonpublic schools must consider (a) costs of resources for providing the desired type of education and (b) the effect of tuition changes on the population of student applicants among whom selections can be made. A national survey is an inefficient method for helping nonpublic schools estimate costs; they can and should individually estimate the costs for their particular situation. Aggregate figures, such as national average costs, would play a negligible role in setting an individual school's tuition. Knowledge about the expected effects of tuition changes on applications, based on national studies, on the other hand, would substantially help in setting tuitions. Production of a summary report relating changes in applications to changes in tuition would be quite useful to a school worried about declining enrollments and rising costs. Quantitative refinement, extension, and updating of results such as those of Brown (1971), that attribute only a small percentage of enrollment decline in Catholic schools to rising tuition, would be helpful.

The second action for nonpublic schools is the setting of student selection standards. The selection standards include both the dimensions to be considered and the levels on those dimensions. While selection of dimensions is arbitrary, selection of levels is, to a great extent, determined by the number of applicants per available student slot. In neither case will national survey data directly facilitate the choice. National survey data

would be indirectly useful, however, in estimating how large a constituency there is for resisting a change in selection procedures encouraged by a government.

Both public and nonpublic schools must make curriculum decisions. With regard to selection of curriculum goals and methods, however, nonpublic schools are essentially different from public schools. On the one hand, many nonpublic schools are religiously affiliated, deriving a portion of their support from the churches and devoting a portion of their instruction to religious topics. On the other hand, unlike public schools, nonpublic schools operate in a competitive market environment and can improve their viability by matching curricula to the wishes of buyers. For this, the results of a national survey--not of nonpublic schools, but of families' desires for curricula--would be quite useful. Thus, a report designed to serve the nonpublic school audience would make use of the results of more than one survey. This kind of facilitation of different surveys should be a focal effort for a central educational data archive such as the Center's.

As with families, if the Center decides to devote a report, or a chapter in a report, to the needs of nonpublic school administrators and staff, a few dozen interviews with representatives of this group prior to survey design are in order.

Turning to the public school audience, the major actions are selections of curriculum goals and methods; and to some extent, those selections are circumscribed by governmental regulations (state and federal). The selections are not necessarily made in response to market demands, and they are not likely to make use of results of a national survey of nonpublic schools--a shift in enrollment must be felt locally, before it will lead to a response by the public school administration. We therefore will not consider this audience further, for this particular survey.

Information needs for the government. Finally, we must consider the government as an audience. Actually, there are different actions to be taken by federal and state governments, and separate reports could be designed for each, but I want to focus here on the federal audience. The federal

government takes action in terms of laws, regulations, and assistance in order to affect the actions of families and schools in such a way that the federal goals of efficiency and equity in education are promoted. We need to spell out these goals more specifically in order to derive specific information needs.

At least four types of concerns exist for which information can be helpful for evaluating policy plans and implementation:

(a) concern about the extent to which the existence of nonpublic schools promotes or interferes with equity in terms of race, sex, or various disadvantagements (educational disadvantage, poverty, handicaps, limited English-speaking ability);

(b) concern about the extent to which the existence of nonpublic schools promotes or interferes with variety in alternatives, such as vocational education;

(c) concern about the effects on the total school system if the nonpublic sector were to drastically expand or contract; and

(d) concern about the side-effects of actions to aid nonpublic schools on society outside of education.

Each of these should be considered in turn to identify analyses of survey data that would have significance for federal policy formulation.

Expanding on the first concern, there have been allegations that some private schools have been created in order to avoid racial integration, that some white parents send their children to private schools and leave public schools to blacks. Data to indicate the extent of this phenomenon, if present, would be useful to federal policymakers deciding how urgent the problem is. Data on racial enrollments would not necessarily suffice, because other legitimate selection criteria might result in a different racial population between public and nonpublic schools. Data showing the level of increases in enrollment in nonpublic schools, however, plotted against the occurrence of local public-school desegregation actions, would provide valuable inputs to arguments about regulations, for example, concerning the tax-exempt status of nonpublic schools. To produce this kind

of information, it is necessary to conceive of each survey as part of a cumulative data base, and effort should be allocated for acquiring other survey data and combining them with current nonpublic-school survey data.

The interaction of the existence of private schools with other federal educational programs is possibly not so urgent. Because categorical programs provide money to supplement regular school curricula, the existence of private schools does not interfere directly with the opportunity of families to have their children receive these extra services in the public schools. This should be explored further, however. Certainly, the new law recognizes the possibility.

Arguments for elementary/secondary tuition tax credits, voucher systems, and other proposals for public support to nonpublic schools are based, to a great extent, on the belief that a large number of nonpublic schools will close without further assistance and that these closings will have a deleterious effect on the whole American educational system. In order to evaluate this belief, it is necessary to know how large the nonpublic sector is and what services it is providing--in relation to the public school sector. Thus, tables showing the numbers of children enrolled in nonpublic schools of various types, at each grade level, are significant. Their significance is increased, however, if they can be translated into monetary costs of absorbing nonpublic school children into public schools, as Swartz (1971) did. His estimates of $1.3 billion to $3.2 billion per year in increased public-school operating costs provided a ballpark estimate of this value dimension for nonpublic schools.

Arguments for providing general support to nonpublic schools also require estimates of the level of need. For this, estimates of percentages of closings and descriptions of changes in school characteristics prior to closing (e.g., declining enrollments) are useful. Their significance is increased if they can be translated into projections of closings and into the effects of particular financial support policies on projections of closings.

Turning to the last consideration for federal policy, side effects on other parts of society of aid to nonpublic schools, it is necessary to estimate who benefits most from particular actions. A first step is to present data on the numbers and percentages of nonpublic schools and students in various segments of society--by states and geographic regions, by urban/rural location, and by socioeconomic status of enrolled students' families, for example. Would aid to nonpublic schools benefit the rich or poor, urban or rural families, or different states differentially? To answer these questions, it is necessary to have demographic information on current enrollments and estimates of changes in enrollment caused by proposed federal aid programs.

Much, if not most, of what I have suggested is infeasible in the context of the data available for writing the report of the current survey during the next month; and I shall turn, in a moment, to consideration of the particular data elements that are available. First, I should like to summarize what I have said and to suggest how other tasks being performed by the Statistical Analysis Group in Education (SAGE) will contribute to increasing the feasibility of such an effort in the future. In what we call "Task 1," we are developing a system for identifying important issues in elementary/secondary education. This system is based both on literature review to identify issues and on consideration of federal policy planning in order to pick out the important issues. Survey designers can, we hope, build upon this system in developing plans for designing, analyzing, and reporting particular surveys. This system would have us recontacting the nonpublic-school experts that you heard from earlier today, and others, during initial planning of future nonpublic-school surveys.

Of course, surveys are carried out in a political context, as we all know, and respondents may be hesitant to provide information just because of the meaning and significance of your reports. If federal policies that would be supported by the data would have a negative impact on respondents, they cannot be blamed for hesitating to respond. For this reason, if for no other, federal policymakers and federal data gatherers should work together to ensure that federal policies are positively oriented and are so because they reflect the perspective of populations served and surveyed.

Implications for the current survey effort. Let us turn now to the current nonpublic-school survey and examine the ways in which the data elements can be combined in order to address the points that I have presented. The primary data base should be considered to be at least the two years of responses, so that change variables can be computed. This will allow, among other things, the use of additional data in imputing missing values.

There are nine types of data elements on the form:

(a) identification and location of school
(b) population density of surrounding area
(c) student characteristic: sex distribution
(d) school characteristic: day/boarding distribution
(e) grade levels served
(f) categorical programs
(g) school size:
    (i) number of graduates
    (ii) number of students in each grade level
    (iii) size of staff
(h) finances
(i) affiliation

Although the survey is not sufficient for addressing all four of the policy concerns mentioned above, they can be combined in different ways to deal with four categories of questions that are significant in terms of the above analysis of federal decision-making.

1. To what extent is elementary-secondary education being done publicly and nonpublicly?

   This question must be answered in order to evaluate the costs of absorbing private-school students into the public schools and to estimate the side effects of Federal aid to nonpublic schools.

2. How do public and nonpublic schools differ?

   This question must be answered in order to evaluate whether supporting nonpublic schools is furthering the goals of federal education programs.

3. How is the situation for nonpublic schools changing?

The answer to this question is critical to determine the urgency of federal intervention of one type or another.

4. How do the offerings of different types of nonpublic schools differ?

It is important to answer this question in order to understand how federal interventions will affect different categories of schools.

For the first of these questions, we can suggest a number of useful displays showing the public/nonpublic breakdown in various segments of education. In every case, however, we need to include data from both nonpublic- and public-school surveys. Displays might be:

(a) overall percentage of students who are in nonpublic schools
(b) percentages by states
(c) percentages by grade levels
(d) percentages by urban/rural location
(e) percentages for particular affiliations.

For example, examination of raw nonpublic enrollment figures by state, (b) above, does not indicate the relative extent to which the nonpublic sector is responsible for schools in each state. For example, the 360,000 nonpublic students in California comprise less than 9% of that state's students, but the 160,000 nonpublic students in Wisconsin comprise more than 15% of that state's students. If we envision the country's nonpublic students being dispersed to nearby public schools, the impact on class size would be greater in Wisconsin than in California.

For the second question, differences between public and private schools, almost all of the raw data elements can be used; for example, (a) size, (b) grade levels served, (c) pupil/teacher ratios, (d) per-pupil expenditures, (e) sex distributions, and (f) availability of categorical programs at appropriate grade levels. For example, the amounts of categorical funds for private-school students included in federal appropriations might depend on the grade levels served. The implications of displays of variation in these measures between

public, nonpublic affiliated, and nonpublic nonaffiliated schools are numerous. The important point is that the presentations be comparisons, not raw figures, so that readers have some anchors for interpreting figures.

For the third question, concerning trends over time, displays of changes from 1976-77 to 1977-78 and from 1970 to 1976 are relevant. It is important in these cases to restrict analyses to comparable populations, so that observed trends cannot be attributed to changes in survey methodology. Although the one-year period is relatively short, it does provide opportunity for the changes to occur, such as enrollment, costs, and closings, that make up longer term trends. Furthermore, comparison with 1970-1976 trends provides a tentative test of the stability of conclusions arrived at, using the 1976-77 to 1977-78 data.

Trends must also be corrected for base-rate changes--changes in costs are more meaningful when shown in constant dollars, and changes in enrollment are more meaningful when related to overall school enrollment changes. For example, yesterday I examined 1971 and 1977 survey reports and listed the states in which there were enrollment declines or gains of more than 10% between 1970 and 1977. There were 20 states with substantial declines and 14 with substantial gains. The states with substantial declines were clustered in the northeast quadrant of the country, with the exceptions of Montana, Idaho, and Mississippi; and the states with substantial gains were in the Southeast, South, and Far West, including Alaska and Hawaii. Assuming that the survey methodologies were comparable, one might be led to ask questions about the regional differences in private-school policies. The differences become much less notable, however, when one compares them with overall population growth trends among the states--to a great extent the variation in nonpublic school enrollment between states reflects overall population growth and decline.

It should be noted that nonresponses, insofar as they can be identified to be closings, are a trend worth displaying. If closures in 1977 can be related to characteristics measured in 1970 or 1976, the data would provide a basis for estimating the rate of closures in the near future. Moreover, using the grade-level data and recent birth-rate data, it should be possible to calculate and display projections of enrollment several years in advance, based on several different alternative sets of assumptions, or models, for increases in costs,

market responses to cost increases, and demographic changes. A simple display of the relations between tuition-cost changes and enrollment changes would be both meaningful and significant.

The fourth category of question, concerning covariation in the educational offerings of nonpublic schools with their characteristics, can be addressed by bivariate tables and measures of correlation or "proportion of variance accounted for." These may be useful for estimating the differential effects of various federal policies on different categories of schools.

Some examples of such covariations are:

- school size and federal program participation
- school location (urban-rural) and federal program participation
- school location (urban-rural) and affiliation
- school location (urban-rural), affiliation, and pupil/teacher ratio
- school location (urban-rural), affiliation, and sex of students
- school location (urban-rural), affiliation, and day/boarding distinction
- per-pupil expenditures and other variables

In choosing which covariations to present, their relevance to issues--that is, to action alternatives and to rationales--should be kept uppermost in mind. Statistical significance is of secondary importance--a negative finding may be quite important if it relates directly to a policy alternative.

In summary, I am suggesting that survey design start with identification of potential readers, then continue by identification of real information needs of these individuals, and result in selection of data elements, analyses and dissemination of report forms that will maximize their utility for those readers.

End of Seminar

References

Brown, K. M. Enrollment in nonpublic schools. In F. J. Fahey (Ed.), Economic problems of nonpublic schools. Notre Dame, Ind.: The Office for Educational Research, University of Notre Dame, 1971.

Kraushaar, O. F. American nonpublic schools: Patterns of Diversity. Baltimore: The Johns Hopkins Press, 1972.

Swartz, T. R. Estimated marginal costs of absorbing nonpublic school students in five public school systems: Selected case studies. In F. J. Fahey (Ed.), Economic problems on nonpublic schools. Notre Dame, Ind.: The Office for Educational Research, University of Notre Dame, 1971.

APPENDIX A

SURVEY QUESTIONNAIRE FOR THE SURVEY OF NONPUBLIC ELEMENTARY AND SECONDARY SCHOOLS WITH TELEPHONE RESPONSE ITEMS INDICATED

TELEPHONE FOLLOW-UP APPROX. 4,300 SCHOOLS

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
EDUCATION DIVISION
WASHINGTON, D.C. 20202

SURVEY OF NONPUBLIC ELEMENTARY AND SECONDARY SCHOOLS
1977–78

FORM APPROVED
OMB NO. 51-R1199

This report is authorized by law (20 U.S.C. 1221e-1). While you are not required to respond, your cooperation is needed to make the results of this survey comprehensive, accurate, and timely. When you have completed this form, please return it according to the instructions contained in the letter which accompanied the form. File copies are provided for your convenience, if you wish to retain a copy. The data collected in this survey will be disclosed upon request to the public under the requirements of the Freedom of Information Act (5 U.S.C. 552).

1. NAME AND ADDRESS INFORMATION

A. NAME OF SCHOOL

B. TELEPHONE — Area Code | Number

C. STREET ADDRESS, P.O. BOX, OR RFD NUMBER

D. CITY OR POSTOFFICE

E. STATE

F. ZIP CODE

2. LOCATION OF SCHOOL

A. NAME OF COUNTY OR COUNTY EQUIVALENT

B. STATE

3. NUMBER OF THE CONGRESSIONAL DISTRICT IN WHICH THIS SCHOOL IS LOCATED →

4. HOW WOULD YOU BEST DESCRIBE THE POPULATION CENTER WHERE THIS SCHOOL IS LOCATED?

- A. ☐ 500,000 OR MORE POPULATION
- B. ☐ 250,000 BUT LESS THAN 500,000
- C. ☐ 100,000 BUT LESS THAN 250,000
- D. ☐ 50,000 BUT LESS THAN 100,000
- E. ☐ 2,500 BUT LESS THAN 50,000
- F. ☐ LESS THAN 2,500 OR RURAL AREA

5. IS THE STUDENT BODY COMPOSED OF

- A. ☐ BOYS ONLY
- B. ☐ GIRLS ONLY
- C. ☐ BOYS AND GIRLS

6. ARE THE STUDENTS

- A. ☐ DAY ONLY
- B. ☐ BOARDING ONLY
- C. ☐ MIXED DAY AND BOARDING

7. HOW WOULD YOU BEST CLASSIFY THIS SCHOOL BY TYPE? *(Check ONLY one box below.)*

- A. ☐ ELEMENTARY - any combination of grades lower than grade 9, usually K or 1 through 8, or K or 1 through 8. DOES NOT include schools classified as MIDDLE or junior high schools which are SECONDARY.
- B. ☐ MIDDLE - any combination of upper elementary and/or lower secondary grades, generally organized to include at least three grades beginning with grade 5 or 6.
- C. ☐ SECONDARY - any combination of grades above grade 6, including junior high schools.
- D. ☐ COMBINED ELEMENTARY-SECONDARY - any combination of elementary AND secondary grades, usually K through 12 or 1 through 12.
- E. ☐ SPECIAL EDUCATION - serves handicapped pupils exclusively. Such schools must offer curricula and services designed to meet the needs of physically handicapped, emotionally disturbed, learning disabled, and/or mentally retarded.
- F. ☐ VOCATIONAL TECHNICAL - serves vocational/technical pupils exclusively. Such schools must offer curricula and programs in one or more semi-skilled, skilled, or technical occupations designed to permit persons who complete to seek employment in the field of training.
- G. ☐ ALTERNATIVE - not an adjunct to or part of a regular school, provides nontraditional educational programs designed to meet needs of pupils which generally cannot be met in the regular school.

8. CHECK EACH OF THE PROGRAMS LISTED BELOW WHICH ARE OFFERED IN THIS SCHOOL

- A. ☐ REGULAR ACADEMIC
- B. ☐ SPECIAL EDUCATION FOR THE HANDICAPPED
- C. ☐ VOCATIONAL/TECHNICAL EDUCATION
- D. ☐ COMPENSATORY EDUCATION FOR THE DISADVANTAGED

9. DOES THIS SCHOOL OFFER ANY COURSES OTHER THAN FOREIGN LANGUAGE COURSES, WHICH ARE TAUGHT IN A LANGUAGE OTHER THAN ENGLISH?

A. ☐ YES B. ☐ NO *(If "YES," specify language.)*

10. DO PUPILS IN THIS SCHOOL PARTICIPATE IN ACTIVITIES OR PROGRAMS OR USE MATERIALS, SUPPLIES, OR EQUIPMENT SUPPORTED BY ANY OF THE FEDERAL ASSISTANCE PROGRAMS LISTED BELOW?

A. ELEMENTARY AND SECONDARY EDUCATION ACT OF 1965 *(ESEA)*	YES	NO		YES	NO
Title I, educationally disadvantaged children			B. FEDERAL SCHOOL LUNCH AND/OR SPECIAL MILK PROGRAMS		
Title IV, Part B, school library resources, instructional equipment, testing, counseling, and guidance services			C. OTHER FEDERAL ASSISTANCE PROGRAMS *(Specify)*		
Title IV, Part C, supplementary educational centers and services, exemplary programs, dropout prevention, and health and nutrition services					

NCES FORM 2325, 7/77 REPLACES EDITION OF 7/76.

11. IS THIS SCHOOL AFFILIATED WITH A RELIGIOUS GROUP OR ORGANIZATION?

A. ☐ YES B. ☐ NO *(If "YES," check appropriate affiliation below.)*

(1) ☐ BAPTIST
(2) ☐ CALVINIST
(3) ☐ EASTERN ORTHODOX
(4) ☐ EPISCOPAL
(5) ☐ FRIENDS
(6) ☐ JEWISH
(7) ☐ LUTHERAN
(8) ☐ METHODIST
(9) ☐ PRESBYTERIAN
(10) ☐ SEVENTH DAY ADVENTIST
(11) ☐ OTHER *(Specify)*

12. IF THIS IS A SECONDARY SCHOOL, HOW MANY PUPILS GRADUATED FROM THE 12th GRADE DURING THE 1976-77 SCHOOL YEAR, INCLUDING THE SUMMER OF 1976?

A. BOYS	B. GIRLS

13. HOW MANY PUPILS WERE ON THE OFFICIAL ROLL OF THIS SCHOOL AS OF OCTOBER 1, 1977 OR THE NEAREST DATE THERETO WHEN THE ENROLLMENT WAS CONSIDERED TO HAVE STABILIZED? *(Please note)*

a. Post Graduate includes only pupils who have graduated and returned to take SECONDARY LEVEL courses. Do not include any pupils who are taking postsecondary courses.
b. Special Education includes physically, emotionally, or mentally handicapped pupils being given instruction in a formal special education program.
c. Ungraded pupils includes only those who are not classified by grade level, and should not include special education pupils.
d. Pupils recorded in the Post Graduate, Special Education, or ungraded categories should not be reported by grade level.

GRADE	NUMBER	GRADE	NUMBER	GRADE	NUMBER	GRADE	NUMBER	GRADE	NUMBER	GRADE	NUMBER
PK		2		5		8		11		Special Graduate	
K		3		6		9		12		Ungraded	
1		4		7		10		Post Graduate		TOTALS	ONLY

14. ENTER THE FULL-TIME EQUIVALENT NUMBER OF PERSONNEL WORKING IN THIS SCHOOL ON OR ABOUT OCTOBER 1, 1977 BY SEX AND ASSIGNMENT CATEGORY. INCLUDE FILLED POSITIONS ONLY; DO NOT INCLUDE VACANT POSITIONS AND VOLUNTEER PERSONNEL *(See instructions which follow for computing full-time equivalence.)*

Full-time equivalence is defined as the amount of the time employed in an assignment category divided by the amount of time that a full-time employee would be expected to serve in the assignment category. One full-time equivalent is expressed as 1.0. The total full-time equivalence for each category should be rounded to the nearest whole number when entering on form. The following examples illustrate how full-time equivalence should be computed.

a. If a teaching position were filled by two persons, one male and the other female, each working one-half day, count each person as 0.5 to the count for male teachers and 0.5 to the count for female teachers.
b. If a full-time employee were assigned to teaching one-half time and counseling one-half time, count this person as 0.5 teaching and 0.5 other professional.

	MALE	FEMALE		MALE	FEMALE		MALE	FEMALE
A. CLASSROOM TEACHERS	TOTAL ONLY		B. OTHER PROFESSIONALS *(e.g., principal, counselors, librarians, etc.)*			C. OTHER PERSONNEL *(e.g., food service workers, clerks, secretaries, etc.)*		

15. FINANCIAL INFORMATION FOR THE 1976-77 SCHOOL YEAR

a. Be sure to include all subsidies, gifts, and earnings on investments under "Other Income."
b. Current operations include income and expenditures for the operation of the academic program of the school. Expenditures should include those for salaries and other expenses for personnel, administration, operation and maintenance, instructional materials and supplies, etc.
c. Auxiliary operations include income and expenditures for operation of dormitories, bookstores, summer camps, transportation, food services, etc.
d. Do NOT include income or expenses for acquisition of capital assets or debt service.

	INCOME			TOTAL EXPENSES
	TUITION AND FEES *(1)*	OTHER *(Include subsidies)* *(2)*	TOTAL *(3)*	*(4)*
A. FOR CURRENT OPERATIONS				
B. FOR AUXILIARY OPERATIONS				
C. *TOTAL (Sum of lines A and B)*				

COMMENTS *(Please comment on any items on this form which you found to lack clarity or otherwise presented difficulty. Attach your comments on a separate sheet which you need not sign, if you prefer not to.)*